

November 7, 2000

Federal Communications Commission
Equipment Authorization Division
Applications Processing Branch
7435 Oakland Mills Road
Columbia, Maryland 21046

To: Errol Chang echang@fcc.gov
From: Jay Sarkar j.sarkar@aprel.com

Subject: Information requested

RE: FCC ID KBCIX250RIM802
Applicant: Itronix Corporation
Correspondence 16788
731 Confirmation No.EA98870
Date of Original e-mail: October 26,2000 3:50 PM

Dear Mr. Chang:

Pursuant to your e-mail to me, dated October 26, 2000, I am forwarding to you our response. The relevant portion of the e-mail from FCC follows with our response inserted in the appropriate place:

1. *The device photo in the EMC report has the antenna on the opposite side of the display as compared to those in the external photo exhibit and SAR report. Please clarify if the antenna may be located on either side of the display and if this could change the reported ERP and SAR results.*

Response: The antenna is attached to the upper right edge of the display screen and should always be on the right side of the device as indicated in the SAR report. Front covers of the both EMC reports and the picture on page 19 of the Spurious Radiation report wrongly exhibit having the antenna on the left side of the device. The antenna can not be mounted on the left side of the device. The two EMC reports are corrected accordingly. The appropriate revised pictures are uploaded with this response. The pictures were taken using a digital camera and processed in a PC using Ditek PhotoWorks software. While processing to insert the pictures in the report, inadvertently those pictures were inverted and show as if the antenna is on the left side. The manual has a statement (page vi) describing that the antenna location is fixed in the upper right edge of the display screen and is not to be relocated.

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2. *Cover letter in manuals exhibit, dated 9/26, indicates a manual will be uploaded within two weeks and it has been more than 4 weeks. Please upload the described manual containing the applicable RF exposure info.*

Response: The described manual in question containing the appropriate RF exposure info is uploaded with this response. We just received from the manufacturer.

3. *It does not appear the separation distance between the antenna and the phantom has been indicated in the SAR report; please clarify and also confirm that if SAR compliance may be affected when the antenna is rotated to other possible orientations. The proposed manual is indicating at least 3 cm.*

Response: The SAR measurement was performed with the separation distance between the antenna and the phantom at 0 cm as indicated in the setup photograph (Appendix A, Figure 1) of the SAR report. The measurement was performed with the antenna in its intended upright vertical position. The highest SAR value is 1.3 W/kg, which is below the FCC limits. There was no impact in the SAR compliance when the antenna was rotated vertical down position. Itronix likes to keep the 3 cm warning statement in the manual for consistency with other manuals, specially when there is no harm in maintaining the statement.

I trust that the above will answer your inquiry. If not, feel free to contact the undersigned. Thanking you in advance for your kind cooperation.

Best regards,



Jayanta (Jay) K. Sarkar

Technical Director, Standards and Certification