

December 23, 2002

American Telecommunications Certification Body, Inc.
6731 Whittier Avenue, Suite C110
McLean, VA 22101
Attn: Dennis Ward

SUBJECT:

**ITRONIX CORPORATION
FCC ID: KBCIX260MPI350
Part 15 Subpart C - Certification
ATCB File No.: ATCB000029
Response to Questions - 12/06/02**

Dear Dennis:

On behalf of Itronix Corporation is our response to your questions dated 12/06/02 requesting additional information for the subject application.

1. Please see attached revised product label and location including two-part statement per 15.19(a)(s) to show compliance of the device with FCC Part 15(B).
2. Please see attached revised Part 15(C) EMC test report from Spectrum Technology Inc. listing the maximum conducted RF output power. Please note that new EIRP data is also submitted due to increased conducted power level. Attached is revised cover letter and Form 731 listing new maximum EIRP level (0.372 Watts). Please also see attached new SAR evaluation report with measurement data for increased conducted power level (max. 21.2 dBm).
3. Please see attached revised Part 15(C) EMC test report from Spectrum Technology Inc. with corrected operating frequencies listed on page 4.
4. Please see attached EMC test data (conducted spurious, occupied bandwidth, band edge, & peak power spectral density) performed by Rhein Tech Labs in February 2001 during the original certification testing of the internal Cisco MPI-350 Mini-PCI WLAN card (FCC ID: LDK102042 granted May 30, 2001). Those measurements were performed using a Cisco MPI-350 WLAN card that is electrically and mechanically identical to the sample tested for this filing, therefore a retest of the above-referenced data was not deemed necessary for this filing.
5. The schematic diagrams for the WLAN card have been uploaded to the application.
6. The block diagram for the WLAN card has been uploaded to the application.
7. Please see attached revised user's manual with reference only to the unit tested in this filing.
8. Please see attached revised antenna photographs showing the location of the antennas in the display section.
9. Please see attached revised SAR evaluation report with measurement data taken at 1.5 cm spacing from the back side of the LCD display. Also attached is the revised users manual RF exposure warning statement with 1.5 cm spacing requirement.
10. Addressed in #8.
11. Please see attached revised user's manual with removal of references to external SMA connectors.
12. Please see attached revised users manual with non-modification statement as required per 15.21 (page 76).
13. SAR RF exposure evaluation was performed on this device due to the fact that the EUT can continue transmitting when the LCD display is in the closed position. This is not an intended operating configuration, however there are no utilities installed to prevent transmit of the device with the LCD display in the closed position, therefore enabling the user to be within 20cm from the back side of LCD display (dual antenna location).
14. A 1.3 dB cable offset was entered into the power meter prior to measuring the conducted power levels.
15. We confirm that the measurement procedures used for the RF exposure evaluation were performed strictly according to the guidelines specified in FCC OET Bulletin 65, Supplement C (01-01), and IEEE 1528-200X (Draft).

If you have any further questions or comments concerning the above, please contact the undersigned.

Sincerely,



Jonathan Hughes
General Manager
Celltech Research Inc.

cc: Itronix Corporation
Spectrum Technology, Inc.