

July 2, 2003

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

SUBJECT: ITRONIX CORPORATION

FCC ID: KBCIX260RIM902 Part 90 Certification ATCB File No.: ATCB000537

Response to Questions - 07/01/03

Dear Tim:

On behalf of Itronix Corporation is our response to your questions dated 07/01/03 requesting additional information for the subject application.

- 1. Attached are internal photographs showing underneath the RF module shields.
- 2. Attached is our resubmitted EMC test report showing revised radiated spurious emission limit of 50 + 10 log (P) in Section 11.1, based on emission mask J per 90.210(j). Also attached are retested conducted spurious emission plots showing the -20 dBm limit.
- 3. Different receive dipole antennas were used between the various ERP tests; therefore different dipole gains are listed in Section 10.1.
- 4. Attached are the radiated test setup photographs submitted as a separate exhibit.
- Per Research In Motion, the Mobitex module RIM 902M has the capability to operate up to 902 MHz in countries where the higher channels above 901 MHz are licensed, however in North America it is only operational up to 901 MHz. The firmware limits the highest transmit frequency to 901 MHz and the highest receive frequency to 940 MHz.
- 6. Please see attached revised SAR test plots with Z-axis scan showing x component value. Please note that the previous Z-axis scan was submitted inadvertently with print software error.
- 7. Please see attached revised SAR test plots and device photographs labeled to clearly indicate the left and right sides of the device.
- 8. Repositioning of the LCD display back side (antenna perpendicular), and Laptop PC bottom side (antenna perpendicular) test configurations was required to view the entire laptop and complete additional cube scans. Please see attached test setup photos showing Laptop PC positioning for the cube scans in those configurations.

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

Sincerely,

Jonathan Hughes General Manager Celltech Labs Inc.

cc: Itronix Corporation