August 31, 2004

Mr. Dennis Ward American Telecommunications Body, Inc. 6731 Whitter Ave., McLean, VA 22101

RE: FCC ID: KBCIX260-PORG82BT_ATCB001559

This letter is in response to your comments of August 27, 2004.

Item 1.) Please refer to Exhibit 13 August 16 Action requested", which should contain the ITRONIX letter requesting confidentiality.

Item 2.) The IX260 has one externally accessible PCMCIA slot. A second PCMCIA slot used for the GC82 radio is not externally accessible without removing screws. The GC82 radio does have its own FCC ID but when installed in the IX260 it is used with a different antenna and co-located with additional radios, so it must be approved under a new "host" FCC ID. Please refer to the photos in the file "Exhibit 9 Internal IX260 & GC82 Photos" which detail the physical installation of the GC82 within the IX260 and the external cover and PCB required to have the screws removed to access this PCMCIA slot used by the GC82.

Item 3.) Please refer to the file "Exhibit 9 WLAN Int Photo with & without shield" for the WLAN photos with shield removed as requested. Please refer to the file "Exhibit 9 Internal IX260 & GC82 Photos" page 6 and 7 which show the PCMCIA card with shields removed.

Item 4.) Please see the Revised Exhibit 1 named "Exhibit 1 Table of Contents & FCC ID Label Rev1", with the new FCC ID label which no longer states "This product contains".

Item 5.) This IX260 PC configuration is intended for mobile and vehicular applications where the spacing between the user and any of the IX260 antennas is 20 cm or greater. The IX260 User Manual states in the last 2 pages the required distance of 20 cm to maintain compliance with the FCC RF exposure requirements.

Item 6.) The channel separation plots for the Bluetooth device are located in the file named "Exhibit 6 ITRONIX BT Part 15.247 Test Report Spectrum", on both High Power Plot 4 and Low Power Plot 4, each showing the 79 hopping frequencies bandwidth.

Item 7.) I attest that the same host unit was used for both the radiated and conducted emissions measurements. I am sorry but the OATS photos are not as bright as the conducted photos. The lighting at the OATS facility isn't too bright and the. If you look in detail you can see a label on the lower left side of the keyboard with handwritten text. This label is evident in both conducted and radiated photos. Additionally, the three software programs Windows running during the conducted tests are evident on screen. In the radiated photos for the simultaneous transmit, the two Part 15 software Windows are evident on screen although too dark to read text clearly like in the conducted. The GC82 was not transmitting during this set of measurements.

INDUSTRY CANADA

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Item 8.) A new IC form file name "ATCB-Form-RSP-100 IX260-PROG82BT IX260d Rev1", has been uploaded to the ATCB server to replace the original IC form. The emissions bandwidth and designators for the WLAN and BT are included on the revised form.

Best Regards,

Rod Munro