

DRAFT Date: January 18, 2006  
Control No: PCM-06-F001  
Assessment No: AN06T5452

Federal Communications Commission  
7435 Oakland Mills Road  
Columbia, MD 21046 USA

Subject: Original Certification Application for Frequency Hopping Spread Spectrum Transmitter  
Panasonic Facsimile with 2.4 GHz FHSS Cordless Telephone Base Unit, Model KX-FG2451  
TCB FCC Certification for FCC ID: ACJ96NKX-FG2451

To Whom It May Concern:

We hereby appoint Compliance Certification Services to act as our agent in the preparation for equipment authorization under FCC Rules. Enclosed, find Panasonic Corporation of North America's original application for the subject transmitter. This product is in compliance with Part 15, Subpart C and Section 15.247.

In accordance with provisions of Section 0.457(d) of the Commission's Rules and Section 552(b)(4) of the Freedom of Information Act, we request confidentiality for Exhibits E, F, G, I and Appendix A, which contain Description of Circuitry, Schematic Diagram, Block Diagram, FHSS Operation of Description and Overview of Frequency Hopping Algorithm. These exhibits contain proprietary, confidential and trade secrets material, which would not be routinely made available for public inspection. Also, in accordance with FCC Public DA 04-1705, we request short-term confidentiality for Exhibits D1, D2 and H, which contain External Photographs, Internal Photographs and draft User Manual. These exhibits contain pre-market information, which could give our competitors unfair advantage should this information be released before this product is actually introduced into the common marketplace.

The subject product is a facsimile machine with built-in 2.4 GHz FHSS cordless telephone base to be marketed under FCC ID: ACJ96NKX-FG2451. The product's transmitter portion uses frequency hopping spread spectrum transmitter with FSK modulation with operation within 2400.914 ~ 2480.293 MHz with 66.1 mW maximum conducted RF output power. The base unit uses dipole antenna with nominal 2.0 dBi antenna gain.

This product was already FCC Part 68 TCB certified by CCL under identification number US: ACJFA10BKX-FG2451. This product may be used with associated portable handset, which was already FCC Part 15C certified by CCS under FCC ID: ACJ96NKX-TG2431. The highest reported SAR values was 0.0465 W/kg for Head and 0.0317 W/kg for Body.

The base unit is classified as mobile and its Uses Manual will contain the following type FCC RF Exposure Warning: "This product complies with FCC radiation exposure limits set forth for an uncontrolled environment. To comply with FCC RF exposure requirements the base unit must be installed and operated with its antenna located 20 cm or more between antenna and all person's body (excluding extremities of hands, wrist and feet). The handset unit may be carried and operated with only the specific provided belt-clip. Other non-tested belt-clips or similar body-worn accessories may not comply and must be avoided. The base and handset units must not be co-located or operated in conjunction with any other antenna or transmitter."

Sincerely yours,

Richard Mullen  
Group Manager