

# Matsushita Electric Corporation of America

Product Safety & Compliance Division

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KM499-U70A

EA96334

Attn.: Joseph Dichose, Electronics Engineer / FCC- Application Processing Branch  
Re: FCC ID: ACJ96NKX-TG2200  
Applicant: Matsushita Electric Industrial Co., Ltd.  
Correspondence Ref No.: 12531  
731 Confirmation No.: EA96334  
FCC E-Mail Date: 03/06/2000  
Product Type: FHSS 2.4~2.5 GHz Cordless Telephone Base and Handset System

Dear Mr. Dichose:

This is in response to your issued comments, please note following answers in the order of your given comments:

## 1. Pseudorandomly Frequency Hopping Sequence Explanation

Under separate cover we will file Appendix B that contains confidential product description report which describes full details of the employed FHSS protocol and associated specifications. Please keep both Appendix A and B as confidential and not subject to general public review.

## 2. Section 15.247(a) Compliance Explanation for Input Bandwidths During Transmitted Packet Signals .

As answer as provided in above item 1.

## 3. Full Schematic Diagram of Base Unit

The provided full schematic diagram of the base unit in Appendix A was filed under confidentiality as it contained circuitry subject to both patent pending issues and other confidential information not normally subject to general release. The partial schematic diagram of the base unit in Exhibit F1 and the full schematic diagram of handset unit in Exhibit F2 may be subject to general release.

## 4. Antenna Gain

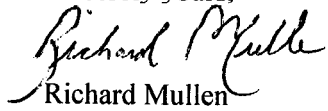
The average gain of the employed omni-directional permanently attached antenna is 1.0.

## 5. RF Safety Requirements / 92 Channel FHSS Transmission 2401.056 ~ 2479.680 MHz

The maximum rated RF output for the base unit is 270 mW and the handset unit is 176 mW. In accordance with Sections 2.1091 and 2.1092, the base unit is classified as a mobile device and the handset unit is classified as a portable device. Upon review of: (1) FCC Parts 2 and 15, (2) FCC OET Bulletins 56 and 65; and (3) ANSI IEEE C95.1-1991 – we understand both the base and handset units may be categorically excluded from routine environmental evaluation for RF exposure. As such, it is our present understanding, based upon the intended usage, operating frequency and low power, the base unit need not be tested for MPE and the handset need not be tested for SAR. If you disagree, for our better understanding, please advise specific rule part(s) that would require MPE measurement for base unit and SAR measurements for handset unit. After your confirmation, if necessary, we will request PCTest to perform these additional tests within the next few days.

I will now await your response to the above given answers to your comments. Thank you for your attention in this matter.

Sincerely yours,

A handwritten signature in black ink that reads "Richard Mullen". The signature is written in a cursive style with a large, prominent "M".

Richard Mullen  
Manager

cc: K. Nawata / KME-KM4  
Randy Ortanez / PCTest