

February 20, 2003

Federal Communications Commission
Equipment Approval Services
7435 Oakland Mills Road
Columbia, MD 21046
Attn: Mr. Stan Lyles

SUBJECT: Matsushita Electric Industrial Co., Ltd.
FCC ID: ACJ96NKX-TG5110
731 Confirmation No.: EA466126
Correspondence Reference No.: 24766
Request for Tech. Info.: 1/30/03

Dear Stan:


Transmitted herewith, on behalf of Matsushita Electric Industrial Co., Ltd. is an amendment provided in response to the request for technical information dated January 30, 2003.

1. The base and the handset are both included in this application. The cover letter only indicates that the Part 68 application for telecom compliance issues pertinent to the base is being handled by a TCB.
2. Please find test report plots for both base and hand set.
3. The maximum peak output power of the base is 0.268 Watts and the maximum peak output power of the handset is 0.170 Watts, as indicated in the amended EMC report.
4. The measured scans generated from the SAR measurement system correspond to the location of the hotspots with respect to the specific phantom. The separation distance from the left ear to the antenna of this unit is slightly greater than that from the right side, hence the left ear SAR peaks appear near the keypad and the right ear SAR peaks near the antenna.
5. Please find attached page 7 of the SAR report with the recipe for the 5.8 GHz liquids
6. Please find attached confidentiality letter regarding probe calibration details/photos and 5.8 GHz recipes.
7. Please find attached justification for validation targets.
8. Details of the 25% duty cycle: The basic repeating frame structure is 10 msec long. It is sub-divided into 8 slots, each 1250 *m*sec long. The active transmission time is 937.5 *m*sec. The first 4 slots are allocated for the "up-link", when the handset transmits to the base set. The last 4 slots form the "down-link", when the base set transmits to the handset. This system uses TDD (Time Division Duplex) for two-way

voice communication. This is accomplished using slot pairs 0 and 4, 1 and 5, 2 and 6, and 3 and 7. Each slot contains 540 bits, 1.74 μ sec in duration, with 312.5 μ sec gap times between each slot. Implementing two slot pairs would correspond to a duty cycle of 25%. This duty cycle was used during SAR evaluation. For a 25% duty cycle, the 1 gram averaged SAR decreased by $25\% \pm 0.5\%$ compared to a 100% duty signal (See attachments)

9. Please find the printouts from the dielectric measurement equipment.
10. Please find attached details of uncertainty development at 5.8 GHz.

If you have any questions, please do not hesitate to contact us.



Randy Ortanez
President & Chief Engineer

cc: Matsushita Electric Industrial, Co. Ltd.