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

Subject: Original Certification Application for Frequency Hopping Spread Spectrum Transmitter  
Panasonic 5.8 GHz FHSS Cordless Telephone System, Model KX-TG5438 Family  
FCC Certification for FCC ID: ACJ96NKX-TG5438

To Whom It May Concern:

Enclosed, find Matsushita Electric Industrial Co., Ltd.'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 filed, which contains Description of Circuitry, Schematic Diagrams, 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.

The subject product is cordless telephone system, which has mobile base unit and portable handset and headset unit. The transceiver portion of this product uses frequency hopping spread spectrum transmitter with FSK modulation with operation within 5759.7 ~ 5838.2 MHz. The base and handset have 115 mW and 70 mW peak conducted RF output power. The base uses left and right antenna with nominal 3 dBi antenna gain and the handset uses  $5/8 \lambda$  pattern antenna with nominal 4 dBi antenna gain.


Regarding RF exposure evaluation:

The base unit is classified as mobile and the User 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."

The handset and headset units are classified as portable and SAR test reports were generated on representative handset model KX-TGA5438 and various headset models. The SAR test report was generated with RF output power at 18.43 dBm (70mW) peak conducted with worst case 10% duty cycle. The worst-case SAR test results for handset was 0.15 W/Kg (head) and 0.26 W/kG (body) and headset (head) was 0.26 W/Kg.

The telephone interface portion of this product's base was Part 68 TCB certified under identification number US: ACJW401BKX-TG5438.

Sincerely yours,

  
Richard Mullen  
Group Manager