

Date: October 19, 2005
Control No: PCTP-05-F015

Attn: Stanley Lyles / FCC Equipment Authorization Branch
Applicant: Panasonic Corporation of North America
FCC ID: ACJ96NKX-THA12
CRN: 29583
731 Confirm No: EA178823
Product Type: 2.4 GHz Cordless Telephone Color LCD Handset, Model KX-THA12

This is in response to the subject Correspondence Reference Number 29583 issued on September 15, 2005.

1. Filing for FCC ID ACJ96NKX-TH102 (EA289114) applies for base, and also includes handset model KX-THA11. This filing FCC ID ACJ96NKX-THA12 (EA178823) is handset model KX-THA12. User manual in this filing is for model KX-TH102 system, same manual as in EA289114 for base and other model handset. Please confirm correct user manual is in this filing, or re-submit if needed.

Answer:

Our PCTP-05-F013 application for 2.4 GHz Cordless Telephone System reported Base Unit Model KX-TH102 and Handset Unit Model KX-THA11, which will be sold together under the same FCC ID: ACJ96NKX-TH102. The subject PCTP-05-F015 application for 2.4 GHz Cordless Telephone Handset Model KX-THA12, and future similarity model KX-THA17, will be marketed under FCC ID: ACJ96NKX-THA12. Both Handset Models KX-THA12 and KX-THA17 under FCC ID: ACJ96NKX-THA12 may be sold separately or part of various KX-TH102 system configurations. Refer to amended User Manuals for both FCC ID: ACJ96NKX-TH102 and FCC ID: ACJ96NKX-THA12.

2. Please provide info about signal timing and how crest factor for SAR was determined.

Answer:

UL Apex, who performed the SAR Test Report, explained the following regarding how the signal timing and crest factor for SAR was determined.

The tests were measured in the maximum packet size.

Ratio of packet time

ON time : OFF time = 5 : 1

Crest factor formula ;

$(ON+OFF) / ON$

= 6/5

= 1.2

Please advise if you should have any other questions or comments. Thank you for your attention in this matter.

Sincerely yours,

Richard Mullen

Richard Mullen
Group Manager