

January 23, 2007

ITPD-06-F026A: BT Part 15C / DSS / EA866610

ITPD-06-F026B: WLAN Part 15C / DTS / EA652874

ITPD-06-F026C: UNII Part 15E / NII / EA560561

ITPD-06-F026D: HSDPA Parts 22H, 24E / PCB / EA465249

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

Subject: Authority to Act as FCC Agent for Panasonic Portable Personal Computer Model CF-19 Family
With Taiyo Bluetooth, Intel WLAN(a+b+g) and Novatel HSDPA
FCC Certification for FCC ID: ACJ9TGCF-194

To Whom It May Concern:

On behalf of Panasonic Corp. of North America, we hereby authorize PCTEST Engineering Laboratory, Inc., to act on our behalf in matters relating to FCC equipment authorization, including the signing of documents relating to these matters. Any and all acts carried out by PCTEST on our behalf shall have the same effect as acts of our own. This project represents Panasonic Portable Personal Computer, Model CF-19 Family with Intel Core Duo 1.06 GHz and Tablet LCD with side panel spacers, which will be marketed under FCC ID: ACJ9TGCF-194.

Under this filing, the Intel WLAN's Part 15E Unlicensed National Information Infrastructure's 5260~5320 MHz high band has been disabled. The U-NII feature will not be enabled until after a FCC certified access point becomes available on the marketplace to enable performance of DFS tests to be performed on this end-product, which operates in only the client mode without radar detection, ad-hoc and peer-to-peer capabilities. The DFS tests will be performed on 5.15~5.25 GHz U-NII frequency band and filed under a Class II Permissive Change application. This product will be marketed with the following co-located transmitters:

(1) Taiyo Yuden Bluetooth, Model EYS1CSMX (Taiyo Yuden has no FCC ID):

<u>FCC Rule Part</u>	<u>Type</u>	<u>Freq Range (MHz)</u>	<u>Output Watts</u>
Part 15C	DSS	2402~2480	0.0191

(2) Intel WLAN (a+b+g), Model WM3945ABG (Intel FCC ID: PD9WM3945ABG)

<u>FCC Rule Part</u>	<u>Type</u>	<u>Freq Range (MHz)</u>	<u>Output Watts</u>
Part 15C	802.11(b)	2412~2462	0.0294
Part 15C	802.11(g)	2412~2462	0.0265
Part 15C	802.11(a)	5745~5825	0.0266
Part 15E	802.11(a) Low Band	5180~5240	0.0204

(3) Novatel HSDPA, Model EU730 (Novatel FCC ID: NBZNRM-EU730)

Novatel FCC Grant Notes: Quad Band GPRS/EDGE & UMTS

<u>FCC Rule Part</u>	<u>Type</u>	<u>Freq Range (MHz)</u>	<u>Output Watts</u>	<u>Emission Designator</u>
Part 22H	Cellular GPRS	824.2~848.8	1.5 W ERP	278KGXW
Part 22H	Cellular HSDPA	826.4~846.6	0.184 W ERP	4M17F9W
Part 24E	PCS GPRS	1850.2~1909.8	0.816 W EIRP	277KGXW
Part 24E	PCS HSDPA	1852.4~1907.6	0.197 W EIRP	4M17F9W

The highest reported SAR values measured with LCD spacers was:

BT Body SAR (2.4 GHz) 0.036 W/kg with LCD flip
802.11a Body SAR (5.2 GHz) 0.561 W/kg at zero spacing
802.11b Body SAR (2.4 GHz) 0.074 W/kg at zero spacing
802.11a Body SAR (5.8 GHz) 1.30 W/kg at zero spacing
802.11g Body SAR (2.4 GHz) 0.129 W/kg at 1.5 cm spacing
Part 22H WCDMA-HSDPA Body SAR (826.4~846.6 MHz) 0.146 W/kg with LCD flip
Part 24E PCS WCDMA-HSDPA Body SAR (1852.4~1907.6 MHz) 0.220 W/kg with LCD flip

This PC contains the following Inverted-F type transmitter antennas, which are all located within the LCD panel: (1) BT TX/RX antenna with 3.06 dBi antenna gain; (2) WLAN Main TX/RX and Aux TX/RX antennas with 2.48 dBi and 3.31 dBi antenna gains; and (3) HSDPA Main TX/RX antennas with 1.84 dBi and Aux Rx only antenna. The PC's main User Manual gives all FCC required notices and warning, including RF Exposure Warning.

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 permanent confidentiality for transmitter's exhibits, which contain Operation Description, Parts Lists & Tune-Up Procedure, Block Diagram and Schematic Diagram. The BT and WLAN transmitters are not user adjustable and do not have a Tune-Up Procedure. 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, which contain External Photographs, Internal Photographs, Test Setup Photographs and the 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.

Sincerely yours,

Richard Mullen

Richard Mullen
Group Manager