

July 23, 2007

ITPD-07-F024A: BT Part 15C / DSS / EA664687

ITPD-07-F024B: WLAN Part 15C / DTS / EA320928

ITPD-07-F024C: UNII Part 15E / NII / EA553598

ITPD-07-F024D: EVDO Parts 22H, 24E / PCB / EA952345

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 Alps Bluetooth, Intel WLAN(a+b+g) and Sierra EVDO Rev A
Original Application for FCC Certification for FCC ID: ACJ9TGCF-196

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 Portable Personal Computer, Model CF-19 Family with Intel Core2 Duo 1.06 GHz and Tablet LCD with side panel spacers, which will be marketed under FCC ID: ACJ9TGCF-196. This product will be marketed with the following co-located transmitters:

(1) Alps Bluetooth, Model UGNZA

(Alps 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	0.01914

(2) Intel WLAN (a+b+g), Model WM4965AG (Intel FCC ID: PD94965AG)

This device complies with Dynamic Frequency Selection requirements in R&O FCC 03-287 as a client only device without radar detection capability.

<u>FCC Rule Part</u>	<u>Type</u>	<u>Freq Range (MHz)</u>	<u>Output Watts</u>
Part 15C	802.11(g)	2412~2462	0.01914
Part 15C	802.11(a)	5745~5825	0.02393
Part 15E	802.11(a) Low Band	5180~5240	0.02042
Part 15E	802.11(a) High Band	5260~5320	0.01824

(3) Sierra EVDO (Rev A), Model MC5725

(Sierra FCC ID: N7N-MC5725)

<u>FCC Rule Part</u>	<u>Type</u>	<u>Freq Range (MHz)</u>	<u>Output Watts</u>	<u>Emission Designator</u>
Part 22H	CELL EVDO	824.70~848.31	0.118 W ERP	1M27F9W
Part 24E	PCS CDMA	1851.25~1908.75	0.428 W EIRP	1M27F9W

The highest reported Body SAR values measured with LCD spacers, LCD in flip position and zero spacing between antennas and body:

0.340 W/kg Cellular EVDO / 0.371 W/kg PCS EVDO

0.066 W/kg (802.11b) / 0.030 W/kg (2.4 GHz BT)

0.592 W/kg (802.11a / 5.2 GHz) / 0.647 W/kg (802.11a / 5.3 GHz) / 0.778 W/kg (802.11a / 5.8 GHz)

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.

Past reported PC under FCC ID: ACJ9TGCF-193 was already FCC certified with optional Car Mounter Model CF-WEB184, which is provided with passive RF pass-thru with two TNC connectors intended for WLAN and WWAN external antennas. One external antenna connector is intended for connection to Radiall/Larsen WLAN 2.4 GHz Base Whip antenna, type NM05E2400BKTNC with 5dBi antenna gain. The other antenna connector is intended for connection of licensed radio service and the WWAN antenna and must be professionally installed. The Supplemental Car Mounter instructions is provided with recommended maximum external antenna gain of 9.85dBi for 824.7~848.31 MHz and 8.34dBi for 1851.25~1908.75 MHz. The only different between past certified FCC ID: ACJ9TGCF-193 and the subject FCC ID: ACJ9TGCF-196 is change the employed Intel WLAN(a+b+g) from Model WM3945ABG to Model WM4965AG. The optional Car Mounter Model CF-WEB184 RF exposure evaluation was satisfied by the provided Maximum Permissive Exposure calculation for mobile operation.

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