

December 17, 2007

ITPD-07-F035A: BT Part 15C / DSS / EA873572

ITPD-07-F035B: WLAN Part 15C / DTS / EA863871

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 and Atheros WLAN(b+g)
Original Application for FCC Certification for FCC ID: ACJ9TGCF-198

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 Core 2 Duo U7500 (1.06 GHz) to be marketed under FCC ID: ACJ9TGCF-198. 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	0.0233

(2) Atheros WLAN (b+g), Model N5HZC0000036 (Atheros has no FCC ID):

<u>FCC Rule Part</u>	<u>Type</u>	<u>Freq Range (MHz)</u>	<u>Output Watts</u>
Part 15C	802.11(b)	2412~2462	0.082
Part 15C	802.11(g)	2412~2462	0.057

The highest reported co-located transmitters Body SAR with LCD in flip position with zero spacing between antenna and body was 0.374 W/kg for 80211.b and 0.040 W/kg for Bluetooth with maximum allowable limit being 1.6 W/kg. 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; and (2) WLAN Main TX/RX and Aux TX/RX antennas with 2.48 dBi and 3.31 dBi antenna gains.

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