

Amended May 30, 2008  
ITPD-08-F007A

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

Subject: Authority to Act as FCC Agent for Panasonic Portable Laptop Computer, Model CF-19mk2 Family  
TCB Certification for FCC ID: ACJ9TGCF-199

- Alps Bluetooth Model UGNZA
- Intel WLAN Intel WLAN (a/b/g), Model 4965AG
- Qualcomm WWAN (HSDPA3.6 + EVDO Rev A), Model UNDP-1

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 Laptop Computer, Model CF-19mk2 Family with Intel CPU type Core2Duo 1.06 GHz (U7500), which will be marketed under FCC ID: ACJ9TGCF-199. This product will be marketed with the following co-located transmitters:

(1) Alps Bluetooth, Model UGNZA (Alps has no FCC ID):

Alps Bluetooth Model UGXZA under specification Ver 2.0 + ERD has maximum symbol rate of 1~3Mbps.

<u>FCC Rule Part</u>	<u>Type</u>	<u>Freq Range (MHz)</u>	<u>Output Watts</u>
Part 15C	DSS	2402~2480	0.0219

(2) Intel WLAN (a/b/g), Model 4965AG (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. This WLAN configuration does not support the 802.11(n) mode and therefore also does not support MIMO function.

<u>FCC Rule Part</u>	<u>Type</u>	<u>Freq Range (MHz)</u>	<u>Output Watts</u>
Part 15C	802.11(b)	2412~2462	0.0273
Part 15C	802.11(g)	2412~2462	0.0213
Part 15C	802.11(a)	5745~5825	0.0391
Part 15E	802.11(a) Low Band	5180~5240	0.0380
Part 15E	802.11(a) High Band	5260~5320	0.0336

(3) Qualcomm WWAN (HSDPA3.6 + EVDO Rev A), Model UNDP-1 (FCC ID: J9CUNDP-1)

<u>FCC Rule Part</u>	<u>Type</u>	<u>Freq Range (MHz)</u>	<u>Output Watts</u>	<u>Emission Designator</u>
Part 22H	Cellular GSM	824.2~848.8	2.223 W ERP	246KGXW
Part 22H	Cellular EDGE	824.2~848.8	0.413 W ERP	245KG7W
Part 22H	Cellular WCDMA	826.4~846.6	0.194 W ERP	4M16F9W
Part 22H	Cellular CDMA	824.7~848.31	0.219 W ERP	1M27F9W
Part 24E	PCS GSM	1850.2~1909.8	1.542 W EIRP	242KGXW
Part 24E	PCS EDGE	1850.2~1909.8	0.826 W EIRP	242KG7W
Part 24E	PCS WCDMA	1852.4~1907.5	0.468 W EIRP	4M17F9W
Part 24E	PCS CDMA	1851.25~1908.75	0.475 W EIRP	1M27F9W

This PC contains the following type transmitter antennas: (1) BT TX/RX Pattern Inverter-F type with 3.06 dBi antenna gain; (2) WLAN Main TX/RX Pattern Inverter-F type with 1.58 dBi at 2.4 GHz, 2.48 dBi at 5.2 GHz and -1.1 dBi at 5.8 GHz; and WLAN Aux TX/RX Pattern Inverter-F type with 2.73 dBi at 2.4 GHz, 3.31 dBi at 5.2 GHz and 3.17 dBi at 5.8 GHz; and (3) Qualcomm WWAN Main TX/RX Pattern Inverter-F type with 1.84 dBi antenna gain and WWAN Aux RX Pattern Inverter-F type. This PC combination does not yet contain the GPS RX only module antenna.

The subject PC combination will not initially be marketed with optional internal mounted GPS Module, Model CF-WGP192 as it will be introduced at later date under a separate filing. This PC may be marketed with optional Car Mounter, Model CF-WEB184 that may be configured to have one or two TNC antenna pass-thru connectors. Depending upon exact PC configuration, the WLAN and WWAN external antenna connector(s) may be connected to recommended Radiall/Larsen WLAN antenna, type MS3E2400TNC with 3 dBi antenna gain or type NM05E2400BKTNC with 5.0 dBi antenna gain. The other antenna connector is intended for licensed radio service external antenna and must be professionally installed. Supplemental instructions will be provided for any employed licensed radio service and will provided external antenna recommended maximum antenna dBi gain. This PC with multiple co-located transmitters and optional Car Mounter with external antenna connectors satisfy RF Exposure Evaluation by the provided SAR and MPE test reports.

Also, the PC main user manual warns regarding Part 15E WLAN usage warning:

This product is restricted to indoor use due to its operation in the 5.15 to 5.25 GHz frequency range. FCC requires this product to be used indoors for the frequency range 5.15 to 5.25 GHz to reduce the potential for harmful interference to co-channel Mobile Satellite systems. High power radars are allocated as primary users of the 5.25 to 5.35 GHz and 5.65 to 5.85 GHz bands. These radar stations can cause interference with and/or damage this product.

The Car Mounter Installation Instructions will provide the following type marking:

This equipment is provided with external antenna connector(s) for connection to optional Car Mounter for mobile external mounted antenna(s). External antenna(s) must be professionally installed and cannot exceed recommended maximum antenna gain as described in individual provided supplement instructions for wireless transmitters. The Car Mounter is provided with Radiall/Larsen WLAN whip antenna, type NMO5E2400BKTNC with 5dBi antenna gain. The maximum allowable antenna gain for the external WWAN base whip antenna for the cellular band is 1.45 dBi, PCS band is 3.53 dBi and 2.4 GHz band is 5.0 dBi. Also, user must maintain minimum 20 cm spacing between external antenna(s) and all person's body (excluding extremities of hands, wrist and feet) during wireless modes of 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, 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 forty-five day short-term confidentiality, starting from the from the issuance of equipment authorization date, for exhibits which contain External Photographs, Internal Photographs, Test Setup Photographs and the Operating Instructions (User Manual). The requested short-term confidentiality 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.

Further, we, the undersigned, hereby attest to the fact that the subject product is also classified as Class B Computer and will be authorized under Declaration of Conformity to comply with FCC Part 15B to meet Class B limits.

Sincerely yours,

*Richard Mullen*

Richard Mullen  
Group Manager  
Product Safety and Compliance Division