

March 24, 2008
ITPD-08-F002A

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

Subject: Authority to Act as FCC Agent for Panasonic Mobile Laptop Personal Computer Model CF-29 Family With Alps Bluetooth Model UGXZ5, Intel WLAN Model WM3B2915ABG and Sierra EVDO Rev A, Model MC5725 / TCB Certification for FCC ID: ACJ9TGCF-29DB

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 Mobile Laptop Personal Computer, Model CF-29mk4 Family with Intel CPU, type Pentium-M-1.6GHz, which will be marketed under FCC ID: ACJ9TGCF-29DB. This product will be marketed with the following co-located transmitters:

Alps Bluetooth, Model UGXZ5 (Alps BT has no FCC ID):

This module contains Bluetooth protocol stack (firmware) under Host Controller Interface and is in compliance with Bluetooth specification Ver 1.1 with maximum symbol rate of 1Mbps. Note, this PC combination will not use Alps Bluetooth Model UGXZA under specification Ver 2.0 + ERD, which has maximum symbol rate of 3Mbps.

<u>FCC Rule Part</u>	<u>Type</u>	<u>Freq Range (MHz)</u>	<u>Output Watts</u>
Part 15C	DSS	2402~2480	0.005802

Intel WLAN (a+b+g) Model WM3B2915ABG (Intel FCC ID: PD9WM3B2915ABG)

<u>FCC Rule Part</u>	<u>Type</u>	<u>Freq Range (MHz)</u>	<u>Output Watts</u>
Part 15C	802.11(b)	2412~2462	0.05781
Part 15C	802.11(g)	2412~2462	0.03855
Part 15C	802.11(a)	5745~5825	0.03006
Part 15E	802.11(a) Low Band	5180~5240	0.01452
Part 15E	802.11(a) High Band	5260~5320	0.03828

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	Cellular CDMA	824.70~848.31	0.082 W ERP	1M27F9W
Part 24E	PCS CDMA	1851.25~1908.75	0.178 W EIRP	1M27F9W

This PC contains the following type transmitter antennas: (1) BT Inverter-F type with 1.47 dBi antenna gain; (2) WLAN Main TX/RX and Aux TX/RX Inverted-F type with 1.86 dBi and 2.86 dBi antenna gain; and (3) Sierra Whip type with 2.15dBi antenna gain. The PC's main User Manual gives all FCC required notices and warning, including general RF Exposure Warning and notice about U-NII operation for indoor use only. This PC contains two unique pass-thru antenna connectors on the bottom of the enclosure for connection to the optional Car Mounter Model CF-WEB291. The Car Mounter has 2 matching unique antenna passive pass-thru connectors, which are hard-wired connected to its rear panel to two external TNC antenna connectors for connection to external WLAN and/or WWAN base whip antennas. The Car Mounter option is marketed to only specific non-general consumers, such as police, fire and military and must be professionally installed by following the provided mounting instructions in all cases.

The Car Mounter is provided with Radiall/Larsen WLAN whip antenna, type NMO5E2400BKTNC with 5dBi antenna gain. Instructions will be provided for end-user provided WWLAN whip antenna that advises the maximum allowable antenna gain for the external WWAN base whip antenna, which is based upon MPE Test Report based upon the maximum allowable ERP/EIRP and maximum permissible exposure for the employed cellular and PCS frequency bands. 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 or Port Replicator 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 2.23 dBi¹ and PCS band is 3.84 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

The subject PC and optional Car Mounter are classified as mobile devices with respect to RF exposure evaluation and the Maximum Permissible Exposure was calculated at 20 cm spacing. There is no co-location between the electric fields of any two transmitters and therefore, the following power densities were calculated for each individual transmitter by frequency at 20 cm spacing: (1) Cellular Band at 824.7 MHz is 0.093 mW/cm²; (2) PCS Band at 1880 MHz was 0.1042 mW/cm²; (3) WLAN 2.4 GHz Band at 2,437 MHz is 0.022 mW/cm²; (4) U-NII 5GHz Band at 5,320 MHz is 0.014 mW/cm²; (5) 802.11a Band at 5,825 MHz is 0.012 mW/cm²; and (6) Car Mounter for Cellular Band at 824.7 MHz is 0.550 mW/cm².

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

¹ The employed EVDO transmitter maximum output power would allow a higher maximum recommended external antenna gain for the external WWAN base whip antenna for the cellular band to be 9.88 dBi and the PCS band to be 7.96 dBi; however, we elected to declare the same recommended maximum antenna gain used for our other PC combination, which uses HSDPA3.6 transmitter with a higher rated maximum RF output power.