

March 1, 2010
ITPD-09-F010A

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

Subject: Authority to Act as FCC Agent for Mobile Personal Computer, Model CF-31 mk1 Family
TCB Certification for FCC ID: ACJ9TGCF-311

- Alps Bluetooth, Model UGNZA
- Intel WLAN, Model 622ANHMW(a/b/g/n) / Model 622BGHMHW(b/g)
- Sierra WWAN, Model Gobi2000 (GSM/EDGE/WCDMA/CDMA with GPS)

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 Personal Computer, Model CF-31mk1 Family with Intel CPU Type i5-520M(2.40GHz – for low model) or Intel CPU Type i5-540M(2.53GHz – for high model) which will be marketed under FCC ID: ACJ9TGCF-311. This product will be marketed with the following co-located transmitters:

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

This BT transmitter complies with FCC Part 15C under equipment class code DSS. This BT version is under specification Ver 2.0 + EDR with maximum symbol rate of 1~3Mbps. Refer to test report for exact frequency range and RF output level.

(2) Intel WLAN Model 622ANHMW Family (Intel FCC ID: PD9622ANH) or Model 622BGHMHW (Intel FCC ID: PD9622BGH):

This combined WLAN and UNII transmitters complies with FCC Parts 15C and 15E under equipment class codes DTS and NII. Refer to test report for exact frequency ranges and RF output levels.

The U-NII portion of this transmitter complies with Dynamic Frequency Selection (DFS) requirements in R&O FCC 03-287 as a client only device without radar detection capability and client software and associated drivers will not initiate any transmission on DFS frequencies, which includes transmissions for beacon ad-hoc peer-to-peer modes. The Intel WLAN theory of operation describes 3x3 MIMO capacities (multiple input/multiple output architecture); however this end-product usage will be limited to 2x2 MIMO capacity. The User Manual will provide the following type wording, pursuant to §15.407(e): This PC operation within 5.15~5.25 GHz band is restricted to indoor use only to reduce any potential harmful interference to co-channel Mobile Satellite Systems.

Model 622ANHMW supports 802.11 a/b/g/n (Intel FCC ID: PD9622ANH). Model 622BGHMHW supports 802.11 b/g (Intel FCC ID: PD9622BGH). Model 622BGHMHW is identical to Model 622ANHMW except that the 802.11a and 802.11n functions are disabled by EEPROM setting for marketing purposes.

(3) Sierra WWAN, Model Gobi2000 (FCC ID: N7NGOBI2)

This combined Cellular and PCS transmitter complies with FCC Parts 22H and 24E under equipment class code PCB. Refer to test report for exact frequency ranges, RF output levels and emission designators.

This PC marketed under FCC ID: ACJ9TGCF-311 contains various antennas for BT, WLAN and WWAN. Refer to separate provided exhibits for antenna photos and test reports for exact antenna description, antenna gains and locations. This portable PC satisfies RF exposure evaluation with the provided co-located transmitters SAR Test Report.

In the future, this PC may be marketed with optional Car Mounter with external antennas for WWAN and GPS. This device will be developed by third party and we will file it under Class II Permissive Change at some later date. When available, the Car Mounter will be marketed to only specific non-general consumers, such as police, fire and military and must be professionally installed by following the provided mounting instructions. The Car Mounter will be provided with Radiall/Larsen WLAN whip antenna, type NMO5E2400BKTNC with 5.0 dBi antenna gain. The other antenna connector is intended for licensed radio service external antenna and the Supplemental Instructions will advise that the recommended maximum external antenna gains are 5.0 dBi for 2.4 GHz (WLAN), 1.50 dBi for 850 MHz (Cellular) and 2.82 dBi for 1900 MHz (PCS).

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 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,

Ben Botros

Ben Botros
Project Manager