

June 29, 2009
ITPD-08-F025A

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

Subject: Authority to Act as FCC Agent for Panasonic Mobile Personal Computer, Model CF-52mk2 Family
TCB Certification for FCC ID: ACJ9TGCF-524

- Alps Bluetooth Model UGNZA
- Intel WLAN/WiMAX, Model 512ANX MMW
- 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 Mobile Personal Computer, Model CF-52mk2 Family with Intel CPU, type Core2 Duo P8400 (2.26GHz) or Core2 Duo P8600 (2.4GHz), which will be marketed under FCC ID: ACJ9TGCF-524. This product will be marketed with the detailed 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/WiMAX, Model 512ANX MMW (Intel FCC ID: PD9512ANXM)

This combined Wi-Fi/WiMAX transmitters complies with FCC Parts 15C, 15E and 27 under equipment class codes DTS, NII and TNB. Refer to test report for exact frequency ranges and RF output levels.

The UNII 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 capacity (multiple input/multiple output architecture); however this end-product usage will be limited to 1x2 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 512ANX MMW is compatible with 802.11a/b/g/n and 802.16e(WiMAX).

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

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 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.

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 with multiple co-located transmitters satisfies RF Exposure Evaluation by the provided MPE test report.

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
Product Safety and Compliance Division