

Date: April 16, 2004
Control No: ITPD-04-F011A, -F011B
WLAN Confirm No: EA905393
CDMA Confirm No: EA796110

To: Diane Poole / FCC Application Processing Branch
FCC ID: ACJ9TGCF-735
Applicant: Matsushita Electric Industrial Co., Ltd.
Correspondence Ref Number: 26734 (for WLAN) and 796110 (for CDMA)
731 Confirm Number: EA905393 (for WLAN) and EA796110 (for CDMA)
Product Name: Panasonic Personal Computer CF-73 Family
With Installed Intel DSS WLAN and Sierra CDMA

I received your comments contained in Correspondence Reference Numbers 26645 and 266555, which were issued on April 13 and 14, 2004. On April 16, 2004 I filed response to these comments. For unknown reason, the filed response was not logged in as received. Today while visiting FCC web site I discovered on April 27, 2004 you issued same comments under Correspondence Reference Numbers 26734 and 26655. Please note below answers to your comments:

EMC:

PCTEST has confirmed that during testing all transmitting modes were investigated. Radiated emissions were tested while all transmitters were transmitting simultaneously and this data was reported in the application.

SAR:

1) FYI:

a) This filing reported Personal Computer, Model CF-73 Family will be marketed with two internal co-located transmitters and the end product enclosure label will display FCC ID: ACJ9TGCF-735. For your reference purpose, we advised these two transmitters were separately certified for Intel and Sierra under their own unique FCC ID's. The installed transmitters are identical to separately certified transmitters, except we will use our own antennas and performed our own RF exposure evaluation based upon this exact end product PC and transmitters configuration. Based upon this answer, we do not believe it is necessary or desirable to add any additional notice on this matter in the user manual.

b) If Intel or Sierra should make any changes, which might have influence upon past reported transmitter documentation, it is agreed these changes would also have to be evaluated for the subject PC.

2) The subject PC under FCC ID ACJ9TGCF-735 will always be marketed and delivered with both transmitters installed. We will submit a new TCB certification application for CF-73+WLAN under FCC ID: ACJ9TGCF-736.

3) The main user manual for CF-73 provides general PC related information. For this exact configuration, we also provide supplementary instructions for Intel WLAN and Sierra CDMA, which provide specific wireless device description and functions.

4) The provided supplemental instructions for each of the individual transmitters include specific FCC RF exposure warning notice with exact required spacing. The main user manual is intended to be generic-in-nature to represent the entire possible PC family portable configuration. In many cases, we have acceptable SAR test results measured at zero spacing, but in accordance with your comment, we agree to amend future main PC user manual marking to reflect the following type wording:

FCC RF Exposure Warning: (if provided with wireless device)

- This equipment complies with FCC radiation exposure limits set forth for an uncontrolled environment.
- This equipment has been approved for portable operation, and unless otherwise advised in separate supplemental instructions for individual wireless transmitter(s), requires minimum 1.5 cm spacing be provided between antenna(s) and all person's body (excluding extremities of hands, wrist and feet) during wireless modes of operation.
- This equipment may use multiple installed transmitters, which may be capable of simultaneous transmission.
- This equipment is provided with PC Card slot that could be used with wireless transmitters, which will be specifically recommended when they become available. Other third-party wireless transmitters have not been RF exposure evaluated for use with this computer and may not comply with FCC RF exposure requirements.

5) PCTEST prepared base station simulator plots indicating the phone power level in dBm after the call box transmits the "Max Power" command. Refer to filed max power screen shots.

6) The provided general Wireless Spec Pages (Op Description Exhibit) included general specifications for all five transmitters, which included Intel WLAN, Alps BT, Siemens GPRS, Sierra CDMA and Sychip WLAN. However, for this exact application for CF-73 under FCC ID: ACJ9TGCF-735 it will use only Intel WLAN and Sierra CDMA.

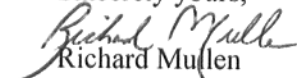
7) PCTEST has amended SAR Test Data Summary for Procedures Used to Establish Test Signal on page 12 to correct typo error from GPRS to CDMA modulation. Refer to filed amended page.

8) The SAR test performed with 1.5 cm spacing from the back of the PC is for Bystander Position behind the PC.

9) PCTEST provided SAR plot showing the intensity difference between the dominant transmitter and the WLAN. A plot for WLAN only is also provided for your reference. Please refer to SAR plots to support the on/off CDMA and WLAN maximum SAR results.

Please advise if you have any further questions or comments. Thank you for your co-operation in this matter.

Sincerely yours,


Richard Mullen

Group Manager

Matsushita Electric Corporation of America
Product Safety & Compliance Division

Cc: Hiroyuki Sakami / MEI-ITPD
Alfred Cirwithian / PCTEST

