

October 21, 2008
ITPD-08-F013A

To: Mr. Gregory Czumak / PCTEST TCB
Re: FCC ID: ACJ9TGCF-F81
Applicant: Panasonic Corporation of North America
Correspondence Reference Number: ACJ80674
Confirmation Number: 807290674-7
Date of Original Email: October 15, 2008

This is in response to your request for additional information.

- Q1. Please submit the Block Diagram for the licensed transmitter, listing all clocks/oscillators, as required.
A1. Attached find updated Alps BT Block Diagram with reference to employed 26 MHz clock crystal.
- Q2. Please resubmit the user's manual, including the language required by Section 15.407(e).
A2. The Operating Instructions will provide the following type wording to compliance with Section 15.407(e):
For PC with WLAN Installed: 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.
- Q3. Please submit the newly required statement from the applicant with respect to ad hoc mode for Part 15E DFS compliance.
A3. Regarding usage of Intel WLAN Model 512AN_MMW - this device complies with Dynamic Frequency Selection 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.
- Q4. The licensed transmitter (WWAN) is approved as a mobile device with regard to RF exposure. As such, the user's manual must include an RF Exposure Warning Statement, instructing the user to operate the EUT such that a minimum separation distance of 20 cm is maintained between the WWAN antenna and all persons during normal operation. Please revise and resubmit the manual. (Again, how is the 1.5 cm separation distance currently in the manual derived?)
A4. As this PC's WLAN and Bluetooth transmitters are classified as portable and WWAN is classified as mobile, please refer to below suggested amended wording to appear within the Operating Instructions:

FCC RF Exposure Warning:

- This PC is provided with PC Card slot that could be used with wireless transmitter(s), which will be specifically recommended when they become available. Other third-party wireless transmitter(s) have not been RF exposure evaluated for use with this computer and may not comply with FCC RF exposure requirements.
- This PC complies with FCC radiation exposure limits set forth for an uncontrolled environment.
- This PC may not be co-located or operated with any other antenna or transmitter.
- This PC with WLAN and/or Bluetooth transmitters installed, has been approved for portable operation and does not require any minimum spacing be provided between antennas and all person's body.
- This PC with WWAN transmitter installed, has been approved for mobile operation and to assure compliance with RF exposure requirements, a minimum of 20 cm (8 inches) must be maintained between the WWAN antenna located in top of LCD and all person's body (excluding extremities of hands, wrist and feet) during wireless modes of operation.

- Q5. Please provide a photo showing that the WWAN antenna is at least 20 cm from the bottom of the EUT.
A5. Attached please find marked-up photograph of all antennas locations, which includes showing WWAN two antennas are located in the top portion of the LCD.

We trust this answers your question. Please advise if you have any other questions or comments.

Sincerely yours,

Ben Botros

Ben Botros
Project Manager

Reviewed by,

Richard Mullen

Richard Mullen
Group Manager