

June 1, 2009
ITPD-09-F002A

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

Subject: Authority to Act as FCC Agent for Handheld Personal Computer, Model CF-U1mk1 Family
TCB Certification for FCC ID: ACJ9TGCF-U14

- Alps Bluetooth, Model UGNZA
- Intel WLAN(a/b/g/n), Model 512AN_MMW
- IPWireless WWAN (TD-CDMA) Module, Model AAU

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 Handheld Personal Computer, Model CF-U1mk1 Family with Intel CPU type Atom Z520 (1.33GHz), which will be marketed under FCC ID: ACJ9TGCF-U14. This product will be marketed with the following co-located transmitters:

Note – this PC with the employed IPWireless WWAN transmitter is marketed to New York City Department of Information Technology and Telecommunications and Northrop Grumman to support the New York City's Private Wireless Network (NYCWIn), which is a high-speed, mobile data network to provide a next-generation public safety infrastructure.

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

This BT transmitter complies with FCC Part 15C under equipment classification code DSS. This BT version is under specification Ver 2.0 + EDR with maximum symbol rate of 1~3Mbps. This transmitter has operation within 2402~2480 MHz at 23.276 mW maximum rated RF output power.

(2) Intel WLAN Model 512AN_MMW (802.11a/b/g/n) (Intel FCC ID: PD9512ANM)

This combined WLAN and UNII transmitters complies with FCC Parts 15C and 15E under equipment classification codes DTS and NII. Part 15C operation is within 2412~2462 and 5745~5825 MHz; and Part 15E operation is within 5180~5240, 5260~5320 and 5500~5700 MHz. Refer to test report for exact frequency ranges and RF output levels. The U-NII portion of this transmitter 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. The Intel WLAN theory of operation describes 3x3 MIMO capacities (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 512AN_MMW is compatible with 802.11a/b/g/n. To enable marketing in Asia Pacific and Europe, this WLAN may have its 802.11a/n functions disabled by factory set EEPROM settings. Model 512AG_MMW is compatible with 802.11a/b/g and Model 512BG_MMW is compatible with 802.11b/g.

(3) IPWireless WWAN (TD-CDMA) Module, Model AAU (FCC ID: PKTPEMAAU1)

This IPWireless WWAN (TD-CDMA) transmitter complies with Part 27, Subpart M (Broadband Radio Service) under equipment class code TNB. This transmitter has operation within 2496~2690 MHz (EBS/BRS frequency blocks) at maximum RF output power of 0.308 W EIRP (TD-CDMA).

This PC marketed under FCC ID: ACJ9TGCF-CFU14 contains various antennas for BT, WLAN and WWAN. Refer to separate provided exhibits for antenna

This Handheld PC satisfies RF exposure evaluation with the provided co-located transmitters SAR Test Report performed with the screen display in the landscape positions with the keyboard facing the user, and with the screen rotated by system software that would enable screen rotation where the keyboard can be either to the left or right side of the user. This would mean the Handheld PC would never be positioned with the keyboard upside down to the user, where the WWAN antenna would face the user body as this is not a normal operating condition.

This PC may be marketed with optional third-party Car Mounter with external antennas for WWAN and GPS and no WLAN external antenna. This device will be developed by third party and we will be filed under Class II Permissive Change at some later date. The Car Mounter will be marketed to only specific non-general consumers, such as NYC, police, fire and military and must be professionally installed by separately provided mounting instructions with recommended maximum antenna gain for WWAN.

The following is example of addendum when this PC is marketed with optional Car Mounter or Port Replicator:
FCC RF Exposure Warning:

- This equipment is provided with external antenna connector for connection to optional Car Mounter or Port Replicator for mobile external mounted antenna. External antenna must be professionally installed and can not exceed recommended maximum antenna gain as follows.
- The Car Mounter is provided with external WWAN base whip antenna for the BRS/EBS band (2496-2690 MHz) with maximum allowable antenna gain of 8.74 dBi. Also, user must maintain minimum 20 cm spacing between external antenna and all person's body (excluding extremities of hands, wrist and feet) during wireless modes of operation.

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 (except for IPWireless WWAN (TD-CDMA)). 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