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BEN BOTROS
Project Manager

Product Safety and Compliance Division

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ITPD-09-F007

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

Subject: Authority to Act as FCC Agent for Handheld Personal Computer, Model CF-U1mk2 Family
TCB Certification for FCC ID: ACJ9TGCF-U15

- Alps Bluetooth, Model UGNZA
- Intel WLAN(a/b/g/n), Model 512AN_MMW
- Sierra WWAN, Model Gobi2000 (GSM/EDGE/WCDMA/CDMA with GPS)

To Whom It May Concern:

On behalf of Panasonic Corp. of North America, we herby 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-U1mk2 Family with Intel CPU type Atom Z530 (1.60GHz), which will be marketed under FCC ID: ACJ9TGCF-U15. 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 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 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 1x1 MIMO capacity. The User Manual with 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) 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.

Panasonic Corporation of North America
One Panasonic Way 4B-8 Secaucus, NJ 07094
Tel: 201-348-7760 / Fax: 201-392-4564
BotrosB@us.panasonic.com

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This PC marketed under FCC ID: ACJ9TGCF-CFU15 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 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.

In the future, this PC may be marketed with optional third-party Car Mounter with external antennas for only WWAN and GPS. This device will be developed by third party and we will be 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 separate provided mounting instructions with recommended maximum antenna gains of 2.64 dBi for 850 MHz (Cellular) and 4.39 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 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

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Project Manager

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Tel: 201-348-7760 / Fax: 201-392-4564
BotrosB@us.panasonic.com