

Class II Permissive Change Letter

June 6, 2012  
ITP-12-F002

Federal Communications Commission  
Authorization and Standards Division  
7435 Oakland Mills Road  
Columbia, MD 21046 USA

Re: Class II Permissive Change Application for Panasonic Single Modular Model WL11A under  
FCC ID: ACJ9TGWL11A / Certified Under FCC Parts 15B, 15C and 15E  
Class II Permissive Change for Installation within Panasonic Personal Computer Model CF-53mk2

To whom it may concern:

Pursuant to CFR § 2.1043, Panasonic Corporation of North America hereby requests a Class II Permissive Change for its application with FCC ID: ACJ9TGWL11A granted on April 22, 2011 by Compliance Certification Services.

This change represents installation of the Module WL11A into Panasonic Laptop PC (Representative Model CF-53mk2) and using this module with an antenna whose gain at 5GHz bands (refer to below) is higher than one filed in the original submission.

<u>Bands</u>	<u>Originally Listed Gain</u>	<u>Main Antenna Gain</u>	<u>Sub Antenna Gain</u>
2400-2500MHz	3.2dBi	0.9dBi	3.06dBi
5180-5320MHz	3.7dBi	0.9dBi	<u>6.74dBi</u>
5500-5700MHz	4.8dBi	1.35dBi	<u>5.94dBi</u>
5700-5825MHz	5.0dBi	1.35dBi	<u>6.22dBi</u>

We hereby declare that the Module Model WL11A still complies with the reduced limit of the output power and power spectral density due to using antenna with gains exceeding 6dBi.

The SAR evaluation of the antenna-to-user distance is 46mm and lap-held configuration is done using representative Panasonic PC CF-31 (IC report: 11J13744-3 issued by UL CCS) based on testing to KDB 616217. The Class II permissive change was filed on 06/07/2011. The new antenna with higher gain in CF-53mk2 is the same type (i.e. pattern antenna), identical construction as the antenna in CF-31 and because previous highest SAR value for the same antenna-to-person separation distance was below 0.8 W/Kg, this was considered to be a Class 1 Permissive Change with respect to RF exposure based on Permissive Change KDB 178919.

Sincerely your,

*Richard Mullen*

Richard Mullen  
Group Manager  
Product Safety & Compliance Division