

Class II Permissive Change Letter

May 16, 2016
ITP-16-F110

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 under
FCC ID: ACJ9TGWL12A / Certified Under FCC Parts 15B, 15C and 15E (For Stand Alone)

To whom it may concern:

Pursuant to CFR§2.1043, Panasonic Corporation of North America hereby requests a Class II Permissive Change (“C2PC”) for the subject application under FCC ID: ACJ9TGWL12A to upgrade U-NII compliance with the new Part 15E rules adopted under Docket No. 13-49.

This C2PC represents:

- a) The previous NII grant is based on 5 GHz old rules. This C2PC application is to seek approval under the 5 GHz new rules including 15.407(b)(4)(ii), so that the device can continue to be marketed after June 2016 until March 1, 2020.
- b) There has been no change to the hardware except for antennas since the original application, granted on May 9, 2012.
- c) To install in Panasonic Host devices, only UNII-3 band is adjusted to a power setting value which is lower than the original*1) setting value.
This setting is more conservative for Emission limits than original setting, so Emission limits comply with FCC 15.247 (d).
*1) Panasonic FCC ID: ACJ9TGWL12A was changed from Intel Mobile Communications, FCC ID: PD96235ANH, granted on October 11, 2011.
- d) This device is applying under FCC 15.407 (b)(4)(ii).
- e) Emission limits comply with FCC 15.247 (d) for the all following antennas under FCC ID: ACJ9TGWL12A. These will not be manufactured, marketed, sold or imported after March 2, 2020.

Part No.	Function	Type	Gain [dBi] (5700-5825 MHz)	Remarks
DFUP2355(1)	Main	PIFA	2.47	
DFUP2355(2)	Aux	PIFA	2.07	
DFUP2067	Main	PIFA	-0.25	Installed in Host CF-19
DFUP1851	Aux	PIFA	1.97	

For RF testing.

- f) 6 dB bandwidth, Conducted output power, Power spectral density and AC line Conducted emission are additionally tested this time. For other requirements, the Intel original data in Report file No.R84671 issued by Elliott Laboratories shows the compliance to 5GHz new rules including 15.407(b)(4)(ii).
- g) The additional RF testing is conducted only for UNII-3 band because the original RF test results for UNII-1, UNII-2A and UNII-2C show compliant with the FCC KDB 789033 D02 General UNII test Procedures New Rules v01r02.
- h) The gain of the antenna used during RF testing is lower than one of the antenna Intel used during the original RF tests. It is the same type antenna as the original one and the maximum gain of antenna is selected in actually used by Panasonic.

For SAR testing.

- i) Additional SAR evaluation for the new antennas DFUP2355(1) and DFUP2355(2) used for U-NII 3 RF testing is exempted according to KDB 178919 D01 V06 Permissive Change Policy Clause VI.B(3)(c) and KDB 447498 D01v06 Clause 4.1(h) because the highest reported SAR for the original Intel antenna is 0.39W/kg i.e. less than 0.8W/kg.
The new antennas should be allowed for mixed mobile/portable conditions with minimum 12mm antenna to user separation distance.

This change does not affect the FCC Part 15 JBP, DTS and DSS because of no changes to digital device and Part 15 Subpart C. This change does not affect the other FCC Part 15 grants under classifications JBP, DTS and DSS because there is no changes to the employed digital device circuitry.

Authorized by,



Richard Mullen
Group Manager
Panasonic Corporation of North America
Product Safety & Compliance Department