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## Class II Permissive Change Letter

April 26, 2016  
ITP-16-F107

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

Re: Re: Class II Permissive Change Application for Panasonic Single Modular under  
FCC ID: ACJ9TGWL13A / 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: ACJ9TGWL13A 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, so that the device can continue to be marketed after June 2016.
- b) To make it comply with the new rule, only UNII-3 band is adjusted to a power setting value which is lower than the original\*<sup>1)</sup> setting value.  
\*1) Panasonic FCC ID: ACJ9TGWL13A was changed from Intel Mobile Communications, FCC ID: PD97260NG, granted on April 17, 2013.

For RF testing:

- c) The additional testing is conducted only for UNII-3 band because the original 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.
- d) The gain of the antenna used during 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:

- e) Additional SAR evaluation for the new antennas DFUP2464 and DFUP2534 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 0.76W/kg i.e. less than 0.8W/kg.

The new antennas should be allowed for mixed mobile/portable conditions with minimum 8mm 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