

Class II Permissive Change Letter

April 26, 2016
ITP-16-F108

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: ACJ9TGWL13A / Certified Under FCC Parts 15B, 15C and 15E
For Installation within Panasonic Personal Computer, Model CF-C2

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. There is no hardware or software change.
- b) Tune-up to operate at a lower power setting than the maximum power allowed for this module but at a same power setting as used in the SAR report approved on October 17, 2013.

For RF testing:

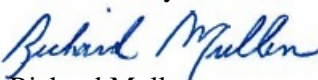
- c) The additional RF testing is conducted only for UNII-3 band because the original RF test results for UNII-1, UNII-2A and UNII-2C show compliant with the FCC KDB 789033 D02 General UNII test Procedures New Rules v01r02.
- d) The additional RF testing is conducted in a stand-alone configuration. This is more conservative configuration than installed in the Host device at the original grant, October 17, 2013.
- e) The gain of the antenna used during testing is higher than one of antennas actually used in the host PC CF-C2. It is the same type antenna as the original one and the maximum gain of antenna is lower gain than used in the original Intel filing.

For SAR testing:

- f) The antennas used in this filing are the identical antennas used in previous filings for the installed in host CF-C2, so additional SAR testing is not needed.

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