

Class II Permissive Change Letter

April 26, 2016
ITP-16-F103

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: ACJ9TGWL15A / Certified Under FCC Parts 15B, 15C and 15E
For Installation within Panasonic Personal Computer, Model CF-20

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: ACJ9TGWL15A 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) 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 November 10, 2015.

For RF testing:

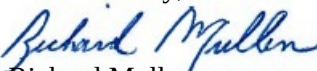
- c) To demonstrate RF compliance in this filing, the reference RF test data of Module WL15A in stand-alone configuration and using antennas whose gain is higher than one of antennas actually used in the host PC CF-20 is re-used according to Test Data Re-use guidance, FCC OET Laboratory Division, April 28, 2016. The re-used reference RF test data demonstrates the worst case data because the higher antenna gain is used and the physical restraints introduced by the Host PC CF-20 enclosure should have resulted in equal or lower level of radiated emission than the module in an open environment.
- d) The test data re-use is applied only for UNII-3 band. 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 because the antennas for these 3 bands are lower gain than used in the original Intel filing.

For SAR testing:

- e) The antennas used in this filing are the identical antennas used in previous filings for the installed in host CF-20, so additional SAR testing is not needed.
- f) Software security per FCC KDB 594280 D02 is still valid the same as original grant, November 10, 2015.

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
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Product Safety & Compliance Department