

Attestation Statement for Proximity Sensor

March 23, 2013
ITP-12-F022D

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

Re: Attestation Statement for Proximity Sensor
Class II Permissive Change Application for Panasonic Single Modular under FCC ID: ACJ9TGWW12E2
Certified Under FCC Parts 22H, 24E and 27
For Installation within Panasonic Personal Computer Model FZ-G1

To whom it may concern:

This is to conform that the proximity sensor input is scanned continuously and the proximity detect event is not overridden by other CPU events (such as low RSSI, high packet loss rate, network power-up command, etc.) The manufacturing tolerance for the capacitor sensor is designed to ensure that the triggering distance is never smaller than the distance evaluated during SAR testing. A short description of how this is achieved is presented below;

- The sensor is sampled at a rate of 100ms intervals using three successive samplings requiring power reduction initiation.
- We ensure that the trigger distance for “edge 1” is never less than 20mm and the trigger distance for the “rear” is never less than 10mm. For the “rear” we tested at 6mm which is more conservative than required by KDB616217.
- The proximity sensor triggering distance is determined by R and C values in the sensor. The values are adjusted to ensure that the triggering distance is never less than the minimum triggering distances specified in the SAR evaluation reports.

As shown in following figures, trigger distance (d) will be inspected in factory for the distance of “edge1” and the rear in order to verify that the sensor performance meets the minimum triggering distance required.

When installed in this host device the module operates at a maximum power level that is lower than the maximum power capability of the module as described in our C2PC request. This power level is factory configured to the settings detailed in the tune-up procedure and SAR report. These settings cannot be altered by the end user or the network.

When the proximity sensor has enabled the power reduction mode the maximum output power is reduced as described in both the tune-up procedure and SAR report. The reduced power levels are also factory configured and cannot be over-riden.

For reference the maximum power levels, which do not account for MPR in LTE modes, and reduced power levels are attached. In LTE modes, when operating in the reduced power mode, MPR is disabled for cases where the (maximum power – MPR) exceeds the reduced power level and the output power is then limited to the reduced power level.

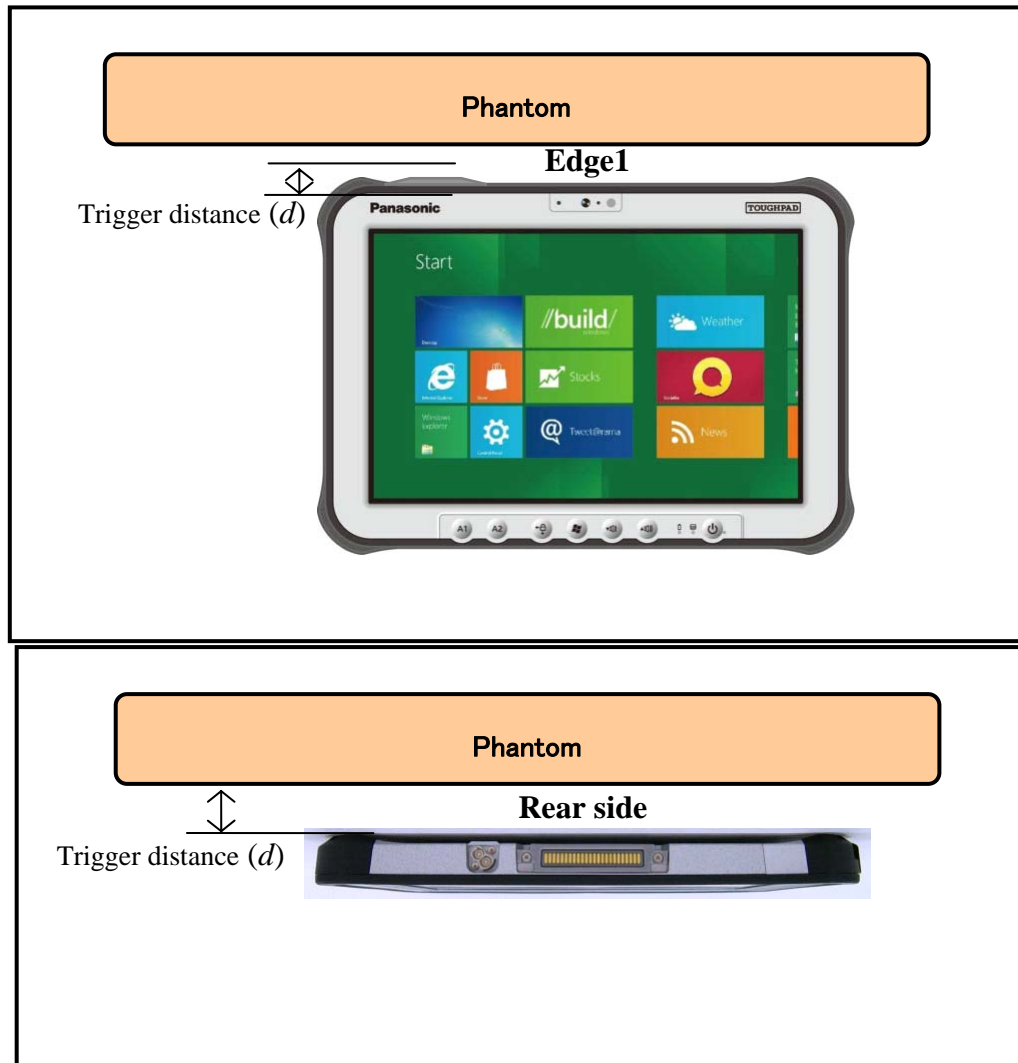
In addition, product inspection will be done twice per year on two samples for EMC, SAR, etc in accordance with Panasonic's internal quality inspection process.

Thank you for your attention in this matter.

Sincerely yours,

Richard Mullen

Richard Mullen
Group Manager
Product Safety & Compliance Division



APPENDIX

Module Power Settings (Power Reduction)

GSM850/GSM1900

| | | | GSMK | | | | 8PSK | | | |
|---------|-----|--------|-----------|-----------|-----------|-----------|-----------|-----------|-----------|-----------|
| BAND | Ch | Freq | w/o Power | w/ Power | w/o Power | w/ Power | w/o Power | w/ Power | w/o Power | w/ Power |
| | | | Reduction | Reduction | Reduction | Reduction | Reduction | Reduction | Reduction | Reduction |
| | | | 1-Slot | 1-Slot | 2-Slot | 2-Slot | 1-Slot | 1-Slot | 2-Slot | 2-Slot |
| GSM850 | 128 | 824.2 | 31.7 | 28.2 | 31.7 | 26.0 | 27.0 | 24.5 | 27.0 | 24.5 |
| | 190 | 836.6 | 31.7 | 28.2 | 31.7 | 26.0 | 27.0 | 24.5 | 27.0 | 24.5 |
| | 251 | 848.8 | 31.7 | 28.2 | 31.7 | 26.0 | 27.0 | 24.5 | 27.0 | 24.5 |
| GSM1900 | 512 | 1850.2 | 29.3 | 26.0 | 29.3 | 23.8 | 26.5 | 23.8 | 26.5 | 21.8 |
| | 661 | 1880 | 29.3 | 26.0 | 29.3 | 23.8 | 26.5 | 23.8 | 26.5 | 21.8 |
| | 810 | 1909.8 | 29.3 | 26.0 | 29.3 | 23.8 | 26.5 | 23.8 | 26.5 | 21.8 |

CDMA2000

| CDMA | | | | Avg. Power | | | | | |
|------|---------|------|-----------|------------|-----------|-----------|-----------|-----------|------|
| BAND | Ch | Freq | RC1 | | RC2 | | RC3 | | |
| | | | w/o Power | w/ Power | w/o Power | w/ Power | w/o Power | w/ Power | |
| | | | Reduction | Reduction | Reduction | Reduction | Reduction | Reduction | |
| BC 0 | 1xRTT | 1013 | 824.7 | 23.0 | 18.6 | 23.0 | 18.6 | 23.0 | 18.6 |
| | | 384 | 836.52 | 23.0 | 18.6 | 23.0 | 18.6 | 23.0 | 18.6 |
| | | 777 | 848.31 | 23.0 | 18.6 | 23.0 | 18.6 | 23.0 | 18.6 |
| | 1xEv-Do | 1013 | 824.7 | 23.0 | 18.5 | 23.0 | 18.5 | 23.0 | 18.5 |
| | | 384 | 836.52 | 23.0 | 18.5 | 23.0 | 18.5 | 23.0 | 18.5 |
| | | 777 | 848.31 | 23.0 | 18.5 | 23.0 | 18.5 | 23.0 | 18.5 |
| BC 1 | 1xRTT | 25 | 1851.25 | 21.4 | 16.8 | 21.4 | 16.8 | 21.4 | 16.8 |
| | | 600 | 1880 | 21.4 | 16.8 | 21.4 | 16.8 | 21.4 | 16.8 |
| | | 1175 | 1908.75 | 21.4 | 16.8 | 21.4 | 16.8 | 21.4 | 16.8 |
| | 1xEv-Do | 25 | 1851.25 | 21.5 | 17.1 | 21.5 | 17.1 | 21.5 | 17.1 |
| | | 600 | 1880 | 21.5 | 17.1 | 21.5 | 17.1 | 21.5 | 17.1 |
| | | 1175 | 1908.75 | 21.5 | 17.1 | 21.5 | 17.1 | 21.5 | 17.1 |

UMTS

| BAND | Mode | UL Ch No | Freq | Tx Conducted Pwr | |
|----------------------------|-------------------------|----------|--------|---------------------|--------------------|
| | | | | w/o Power Reduction | w/ Power Reduction |
| UMTS (WCDMA) Band V | Rel 99 (RMC, 12.2 kbps) | 4357 | 826.4 | 23.2 | 18.3 |
| | | 4408 | 836.6 | 23.2 | 18.3 |
| | | 4458 | 846.6 | 23.2 | 18.3 |
| | HSDPA | 4357 | 826.4 | 21.2 | 17.3 |
| | | 4408 | 836.6 | 21.2 | 17.3 |
| | | 4458 | 846.6 | 21.2 | 17.3 |
| | HSUPA | 4357 | 826.4 | 21.2 | 17.3 |
| | | 4408 | 836.6 | 21.2 | 17.3 |
| | | 4458 | 846.6 | 21.2 | 17.3 |
| UMTS (WCDMA) Band IV | Rel 99 (RMC, 12.2 kbps) | 1312 | 1712.4 | 21.9 | 17.8 |
| | | 1413 | 1732.6 | 21.9 | 17.8 |
| | | 1513 | 1752.6 | 21.9 | 17.8 |
| | HSDPA | 1312 | 1712.4 | 21.2 | 16.8 |
| | | 1413 | 1732.6 | 21.2 | 16.8 |
| | | 1513 | 1752.6 | 21.2 | 16.8 |
| | HSUPA | 1312 | 1712.4 | 21.2 | 16.8 |
| | | 1413 | 1732.6 | 21.2 | 16.8 |
| | | 1513 | 1752.6 | 21.2 | 16.8 |
| UMTS (WCDMA) Band II | Rel 99 (RMC, 12.2 kbps) | 9262 | 1880 | 21.9 | 16.0 |
| | | 9400 | 1880 | 21.9 | 16.0 |
| | | 9538 | 1907.6 | 21.9 | 16.0 |
| | HSDPA | 9262 | 1880 | 21.7 | 15.5 |
| | | 9400 | 1880 | 21.7 | 15.5 |
| | | 9538 | 1907.6 | 21.7 | 15.5 |
| | HSUPA | 9262 | 1880 | 21.7 | 15.5 |
| | | 9400 | 1880 | 21.7 | 15.5 |
| | | 9538 | 1907.6 | 21.7 | 15.5 |