

Amendment: October 13, 2006
ITPD-06-F016A: BT Part 15C / DSS / EA923977
ITPD-06-F016B: WLAN Part 15C / DTS / EA566553
ITPD-06-F016C: UNII Part 15E / NII / EA355210

Federal Communications Commission
7435 Oakland Mills Road
Columbia, MD 21046 USA

Subject: Authority to Act as FCC Agent for Panasonic Toughbook Computer, Model CF-19 Family
with Taiyo Bluetooth and Intel WLAN(a+b+g) / FCC Certification for FCC ID: ACJ9TGCF-191

To Whom It May Concern:

On behalf of Panasonic Corp. of North America, we hereby authorize PCTEST Engineering Laboratory, Inc., to act on our behalf in matters relating to FCC equipment authorization, including the signing of documents relating to these matters. Any and all acts carried out by PCTEST on our behalf shall have the same effect as acts of our own. This project represents Panasonic Portable Toughbook Computer, Model CF-19 Family with Intel Core Duo 1.06 GHz and Tablet LCD, without side panel spacers, to be marketed under FCC ID: ACJ9TGCF-191.

Under this filing, the Intel WLAN's Part 15E Unlicensed National Information Infrastructure's 5260~5320 MHz high band has been disabled. The U-NII feature will not be enabled until after a FCC certified access point becomes available on the marketplace to enable performance of DFS tests to be performed on this end-product, which operates in only the client mode without ad-hoc and peer-to-peer capabilities. The DFS tests will be performed on 5.15~5.25 GHz U-NII frequency band and filed under a Class II Permissive Change application. This product will be marketed with the following co-located transmitters:

(1) Taiyo Yuden Bluetooth, Model EYS1CSMX (Taiyo Yuden has no FCC ID):

<u>FCC Rule Part</u>	<u>Type</u>	<u>Freq Range (MHz)</u>	<u>Output Watts</u>
Part 15C	DSS	2402~2480	0.019

(2) Intel WLAN (a+b+g), Model WM3945ABG (Intel FCC ID: PD9WM3945ABG)

<u>FCC Rule Part</u>	<u>Type</u>	<u>Freq Range (MHz)</u>	<u>Output Watts</u>
Part 15C	802.11(b)	2412~2462	0.0266
Part 15C	802.11(g)	2412~2462	0.0294
Part 15C	802.11(a)	5745~5825	0.0266
Part 15E	802.11(a) Low Band	5180~5240	0.0204

The highest reported SAR values measured without LCD spacers:

0.169 W/kg 802.11b Body SAR / 0.147 W/kg 802.11g Body SAR

0.459 W/kg 802.11a Body SAR / 0.883 W/kg 802.11a Bluetooth Body SAR.

0.689 W/kg 802.11a Body SAR for U-NII Low Band

This PC contains the following Inverted-F type transmitter antennas, which are all located within the LCD panel: (1) BT TX/RX antenna with 3.06 dBi antenna gain; and (2) WLAN Main TX/RX and Aux TX/RX antennas with 2.48 dBi and 3.31 dBi antenna gains. The PC's main User Manual gives all FCC required notices and warning, including RF Exposure Warning.

In accordance with provisions of Section 0.457(d) of the Commission's Rules and Section 552(b)(4) of the Freedom of Information Act, we request permanent confidentiality for transmitter's exhibits, which contain Operation Description, Parts Lists & Tune-Up Procedure, Block Diagram and Schematic Diagram. The Bluetooth and WLAN transmitters are not user adjustable and do not have a Tune-Up Procedure. These exhibits contain proprietary, confidential and trade secrets material, which would not be routinely made available for public inspection. Also, in accordance with FCC Public DA 04-1705, we request short-term confidentiality for exhibits, which contain External Photographs, Internal Photographs, Test Setup Photographs and the User Manual. These exhibits contain pre-market information, which could give our competitors unfair advantage should this information be released before this product is actually introduced into the common marketplace.

Sincerely yours,

Richard Mullen

Richard Mullen
Group Manager