

November 16, 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

To: Steven Dayhoff / FCC Application Processing Branch  
FCC ID: ACJ9TGCF-191  
Applicant: Panasonic Corporation of North America  
731 Confirmation Numbers: EA923977 and EA566553  
Correspondence Ref Numbers: 32024 and 32025  
Subject: Laptop Computer, Model CF-19 with BT and WLAN(a+b+g)

FCC comments issued on November 13, 2006:

FYI here again are FCC guidelines about SAR test positions for tablet computers:

- FCC SAR test procedures for tablet computers

- a) For both one-section (slate) and two-section-hinged (convertible) types
- b) Tablets may have up to four user-selectable display orientations - 0-deg portrait, 0-deg landscape, 180-deg portrait, 180-deg landscape
- c) Similarly as for notebooks with antenna(s) in the keyboard section, for lap-held use configuration SAR is tested with tablet bottom-face against a flat phantom
- d) SAR is tested with edges of the tablet computer in direct contact against a flat phantom (display face perpendicular to phantom) for:
  - i) Each edge containing antenna(s), unless final-product firmware prevents radio transmissions for position having antenna-edge in contact with phantom and 0-deg relative-to-phantom display orientation
  - ii) Each edge not containing antenna(s) that is adjacent to an edge containing antenna(s), where adjacent-edge antenna(s) are within 10 cm from the phantom

SAR evaluation in this filing appears to use only 1.5 cm spacing between antenna edge and phantom in tablet configuration - please submit 0 cm spacing data per d) i) above.

FYI we note that SAR evaluation data for conventional notebook configuration (90 deg between display and base) with 1.5 cm spacing from the display is submitted voluntarily by applicant

Answer:

This PC contains the BT TX/RX antenna and WLAN Main TX/RX and Aux TX/RX antennas located within the LCD. The SAR body test data was generated with LCD in both landscape modes of operation with zero spacing between top and bottom of LCD panel to the phantom body.

The SAR bystander test data was generated with LCD in both portrait models of operation with 1.5 cm spacing between the left and right sides of the LCD to the phantom body. We believe this is acceptable because whenever either the Aux or Main antenna is positioned against the body, that antenna is automatically disabled. As such, in the portrait mode of operation, the only active antenna is always located greater than 20 cm from possible bystander. Refer to separate submitted confidential photograph/drawing of Tablet Configuration for SAR Testing in landscape and portrait modes.