

June 4, 2007
 ITPD-07-F006-1
 EA651437

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

Subject: Class II Permissive Change for Panasonic Mobile Personal Computer Model CF-19 Family
 With Taiyo Bluetooth Model EYS1CSMX, Intel WLAN(a+b+g) Model WM3945ABG
 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 Portable Personal 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. This portable product was already FCC certified 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) UNII Low Band | 5180~5240 | 0.0204 |

This filing is to declare the Intel WLAN will have its Part 15E UNII 5260~5320 MHz high frequency band enabled. This transmitter complies with Part 15E UNII's Dynamic Frequency Selection (DFS) requirements found in R&O FCC 03-287 and §15.407(h) as a client only device without any radar detection capability. Representative Elliott Laboratories DFS Test Report was generated while Intel WLAN was installed within Personal Computer Model CF-19, while connected to Cisco Aironet 1200AG Access Point, which as FCC certified under FCC ID: LDK102056. The amended Part 15E certification grant should be amended to declare the following specifications:

| <u>FCC Rule Part</u> | <u>Type</u> | <u>Freq Range (MHz)</u> | <u>Output Watts</u> |
|----------------------|--------------------------|-------------------------|---------------------|
| Part 15E | 802.11(a) UNII Low Band | 5180~5240 | 0.0204 |
| Part 15E | 802.11(a) UNII High Band | 5260~5320 | 0.0137 |

The highest reported measured SAR value was 0.509 W/kg 802.11a Body SAR for U-NII High 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.

The WLAN provided User Manual provides the following type notices:

- This product is restricted to indoor use due to its operation in the 5.15 to 5.25 GHz frequency range.
- FCC requires this product to be used indoors for the frequency range 5.15 to 5.25 GHz to reduce the potential for harmful interference to co-channel Mobile Satellite systems.
- High power radars are allocated as primary users of the 5.25 to 5.35 GHz and 5.65 to 5.85 GHz bands. These radar stations can cause interference with and /or damage this product.

Please advise if you have any questions or comments.

Sincerely yours,

Richard Mullen

Richard Mullen
Group Manager