

Date: May 19, 2004
Control No: ITPD-04-F010A
WLAN Confirm No: EA555862
GPRS Confirm No: EA192504

To: Andy Leimer / FCC Application Processing Branch
FCC ID: ACJ9TGCF-734
Applicant: Matsushita Electric Industrial Co., Ltd.
Correspondence Ref Numbers: 26699 and 26698
731 Confirm Number: EA555862
Product Name: Panasonic Personal Computer CF-73 Family
With Installed Intel WLAN and Siemens GPRS

This is in response to your 2 separate sent comments received on April 22, 2004 regarding the WLAN portion of the subject application.

EMC:

PCTEST has confirmed that during testing all transmitting modes were investigated. Radiated emissions were tested while all transmitters were transmitting simultaneously and this data was reported in the application.

SAR:

1) FYI:

- a) This filing reported Personal Computer, Model CF-73 Family will be marketed with two internal co-located transmitters and the end product enclosure label will display FCC ID: ACJ9TGCF-734. For your reference purpose, we advised these two transmitters were separately certified for Intel and Siemens under their own unique FCC ID's. The installed transmitters are identical to separately certified transmitters, except we will use our own antennas and performed our own RF exposure evaluation based upon this exact end product PC and transmitters configuration. Based upon this answer, we do not believe it is necessary or desirable to add any additional notice on this matter in the user manual.
- b) If Intel or Siemens should make any changes, which might have influence upon past reported transmitter documentation, it is agreed these changes would also have be to evaluated for the subject PC.

2) The subject PC under FCC ID ACJ9TGCF-734 will always be marketed and delivered with both transmitters installed. We will submit a new TCB certification application for CF-73+WLAN under FCC ID: ACJ9TGCF-736.

3) The provided supplemental instructions for each of the individual transmitters include specific FCC RF exposure warning notice with exact required spacing. The main user manual is intended to be generic-in-nature to represent the entire possible PC family portable configuration. In many cases, we have acceptable SAR test results measured at zero spacing, but in accordance with your comment, we agree to amend future main PC user manual marking to reflect the following type wording:

FCC RF Exposure Warning: (if provided with wireless device)

- This equipment complies with FCC radiation exposure limits set forth for an uncontrolled environment.
- This equipment has been approved for portable operation, and unless otherwise advised in separate supplemental instructions for individual wireless transmitter(s), requires minimum 1.5 cm spacing be provided between antenna(s) and all person's body (excluding extremities of hands, wrist and feet) during wireless modes of operation.
- This equipment may use multiple installed transmitters, which may be capable of simultaneous transmission.
- This equipment is provided with PC Card slot that could be used with wireless transmitters, which will be specifically recommended when they become available. Other third-party wireless transmitters have not been RF exposure evaluated for use with this computer and may not comply with FCC RF exposure requirements.

4) PCTEST prepared base station simulator screen shots to demonstrate that the device was operating at maximum power. Refer to uploaded file.

5) The provided general Wireless Spec Pages (Op Description Exhibit) included general specifications for five transmitters, which included Intel WLAN, Alps BT, Siemens GPRS, Sierra CDMA and Sychip WLAN. However, for this exact application under FCC ID: ACJ9TGCF-734, it will use only Intel WLAN and Siemens GPRS.

6) The SAR test performed with 1.5 cm spacing from the back of the PC is for Bystander Position behind the PC.

Please advise if you have any further questions or comments. Thank you for your co-operation in this matter.

Sincerely yours,



Richard Mullen
Group Manager

Matsushita Electric Corporation of America
Product Safety & Compliance Division

Cc: Hiroyuki Sakami / MEI-ITPD
Alfred Cirwithian / PCTEST

