Date:	June 14, 2004
Control No:	ITPD-04-F016A
WLAN+BT Confirm No:	EA308063
GPRS Confirm No:	EA743043

To:	Steven Dayhoff / FCC Application Processing Branch
FCC ID:	ACJ9TGCF-P12
Applicant:	Matsushita Electric Industrial Co., Ltd.
Correspondence Ref Number:	26697, 308063, 743043
731 Confirm Number:	EA308063
Product Name:	Panasonic Handheld Computer, Model CF-P1 Family With Installed Sychip WLAN, Alps BT and Siemens GPRS

This is in response to the above referenced correspondence numbers received from FCC's Steven Dayhoff and Tim Harrington for WLAN+BT portion of the subject product:

EMC1) EMC report mentions CDMA in several places - this filing is for GSM/GPRS - please explain and/or revise.
Answer: Refer to uploaded amended test report with corrected typed errors.

EMC2) PCTEST confirmed this product was investigated and tested with both single and simultaneous transmissions and the worst-case test mode and test data was reported.

SAR:
1) FYI:
a) The subject Handheld Computer, Model CF-P1 Family will always be marketed with three internal co-located transmitters. For your reference purpose, we advised these three transmitters were separately certified for Sychip, Alps 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 configuration.
b) If Sychip, Alps 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. Based upon this answer, we do not believe it is necessary or desirable to add any additional notice for this matter in the user manual.

2) The subject Handheld PC will always be marketed and delivered with all three transmitters installed under FCC ID ACJ9TGCF-P12. We will submit new TCB certification application for CF-P1+WLAN+BT under new FCC ID: ACJ9TGCF-P14.

3) Please provide setup details and results for power test for each channel in SAR. SAR data table pages state only "MAX power." Please demonstrate that the device was operating at maximum power.
Answer: PCTEST revised the SAR report and base station simulator screen shots to demonstrate that the device was operating at maximum power.

4) Op Desc has "Class 10 (2Tx)" and "Class 8 (1Tx)," SAR report shows "POWER CLASS 5" for GSM and GPRS 850, and power class 0 for GSM PCS and GPRS 1900 - please explain number of slots and power in each case.
Answer: Please refer to uploaded additional document explaining number of slots and power in each case.

5) The provided general Wireless Spec Pages (Op Description Exhibit) included general specifications for a total of five possible transmitters. This exact filing configuration does not include Sierra CDMA and Intel WLAN.

6) The subject PC is a handheld, held-to-face and held-to ear type product. We have acceptable maximum SAR test results when measured at zero spacing at head, ear and cheek. As such, we do not believe it is necessary to describe minimum spacing requirements in the user manual for held-to-face and held-to-ear operating modes. The provided supplemental instructions for individual WLAN and GPRS transmitters provide general recommended spacing warning notice of 1.5 cm and 2.5 cm for WLAN and GSM modes of operation. The main user manual does not provide any spacing requirements.
In the future, we will amend the GPRS supplemental instructions to reflect the same recommended spacing of 1.5 cm spacing.

7) The subject model CF-P1 (P1 Series) is provided with 23-key numeric keypad. Similarity model CF-P1 (P3 Series) is provided with 38-keyboard (QWERTY type). Both models use the same antenna and modules. The existing CF-P1 (P1 Series) SAR test report with zero spacing at head, ear and cheek represents both models.

8) User manual "Model No. CF-P1Series" pg 44 says "Microphone/Receiver - Built-in for supporting as Mobile Phone" pg 9 shows "Receiver" near upper right of display, and internal microphone at lower right of handset. This does not seem to match with Horizontal Center Line and Vertical Center Line as defined in SAR report. Please explain or revise/re-test.
Answer: During the original testing PCTEST evaluated the test position that you have suggested. The test data and photos are attached. Since the user can easily hear the speaker in the position previously submitted and since most people may consider this a more normal position to hold a phone we submitted the SAR data for this position (since it yielded the highest SAR value).

9) Please describe a typical held-to-ear 3-transceiver simultaneous transmit scenario.
Answer: Functionally, the three transmitters can transmit simultaneously in held-to-ear use. However, this situation is a very rare case because WLAN and BlueTooth are usually used under the condition watching LCD display.

10) SAR data tables for "face" show 850mhz at 1.5cm but 1900mhz at 2.5cm - please explain and/or revise/re-test.
Answer: Please refer to page 29-revised SAR report for "FACE" 850MHz at 2.5cm.

11) Refer to uploaded amended cover letter, which includes block diagrams within the request for confidentiality.

12) Refer to uploaded copy of Siemans GPRS occupied bandwidth test data generated under their own unique FCC ID: QIPMC46.

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