

January 12, 2005

ITPD-04-F105A: BT Part 15C Equip Class DSS: EA737203
ITPD-04-F105B: WLAN Part 15C Equip Class DTS: EA785986
ITPD-04-F015C: WLAN Part 15E Equip Class NII: EA852575

To: Andrew Leimer / FCC Application Processing Branch
FCC ID: ACJ9TGCF-182A
Applicant: Panasonic Corporation of North America
(before January 1, 2005 was Matsushita Electric Industrial Co., Ltd.)
Correspondence Ref Numbers: 28302 and 28304
731 Confirm Numbers: EA852575 and EA785986
Product Name: Panasonic Portable Notebook Computer CF-18 Family

Please note below answers to your comments issued on January 5 and 12, 2005.

FCC 1:

Please justify that BT collocation was fully evaluated. ON/OFF technique may not apply to higher powered BT devices. Until test procedures are further standardized, the FCC will consider use of spatial distribution summation techniques to determine collocated SAR. This assumes device responses are linear. It is understood that such summation routines are implemented in commercial SAR systems.

PCTEST Answer 1:

We evaluated the SAR distribution during simultaneous transmission and determined from the SAR plots that the hot spots did not overlap. We did not believe that spatial distribution was needed in this case. Please find attached the SAR plot.


FCC 2:

Please explain differences between this device and ACJ9TGCF-181A. It appears that the exact same SAR results are used for both devices even though one does not contain a BT.

PCTEST Answer 2:

The only difference between the two models is that the subject CF-182A notebook computer has a bluetooth transmitter and the CF-181A notebook computer does not. We evaluated the SAR with the worst case transmitter combination (UNII) with BT on and off. The SAR was slightly higher with the BT transmitter off. This may be due to power supply load characteristics drawing power from the main transmitter. In any event this phenomenon causes the SAR readings in this configuration to be very similar to the lesser combination model without Bluetooth.

Sincerely yours,


Richard Mullen
Group Manager