

June 28, 2005

ITPD-04-F106A: WLAN Part 15C / DTS / EA142582

ITPD-04-F106B: WLAN Part 15E / NII / EA268031

ITPD-04-F106C: EGPRS Parts 22H, 24E / PCB / EA976179

To: Stanley Lyles  
Applicant: Panasonic Corporation of North America  
FCC ID: ACJ9TGCF-183A  
731 Confirmation No: EA142582, EA268031 and EA976179  
Correspondence No: 28964, 28965 and 28966  
Product: Panasonic Notebook Computer Model CF-18mk3 Family

This is in response to the above mentioned correspondences dated May 18, 2005, various telephone conversations and face-to-face meeting with FCC.

1. This is in response to the subject product when used in tablet mode does not provide adequate spacing between the LCD side panels and user's body to satisfy RF exposure evaluation. We considered FCC's comment, which suggested "we encourage consideration of source-based duty factors where justifiable, or selective transmitter disabling or power reductions." At this point-in-time, it is not possible to consider selective transmitter disabling and/or power reduction. However, in the future we may want to use source-based duty cycle correction factors, but we will need time to study and come to agreement on exactly how to justify, test and/or calculate. To satisfy FCC's immediate concern, we have agreed to modify the subject product's outer enclosure to add permanently attached LCD side panel extenders, which in affect will increase the spacing between the internal antennas and user body by an additional 1.5 cm spacing. Under separate cover will submit additional SAR Test Report with added plastic spacers, which had minor influence upon past reported SAR Test Report performed on the higher 5 GHz frequency range with 1.5 cm air spacing. Also, we will submit photographs of these added side panel extenders.


The maximum worse-case SAR measurements with 1.5 cm air spacing was: 0.390 W/kg GSM850 Body SAR; 0.224 W/kg GSM 1900 Body SAR; 0.275 W/kg 802.11b Body SAR; 0.185 W/kg 802.11g Body SAR; 0.349 W/kg 802.11a (5300 MHz) Body SAR; and 0.582 W/kg 802.11a (5800 MHz) Body SAR.

The maximum worse-case SAR measurements with added 1.5 cm LCD side panel extenders and zero air spacing was: 0.348 W/kg GSM850 Body SAR; 0.145 W/kg GSM 1900 Body SAR; 0.243 W/kg 802.11b Body SAR; 0.722 W/kg 802.11a (5300 MHz) Body SAR; and 0.780 W/kg 802.11a (5800 MHz) Body SAR.

2. The requested confidential information for Siemens EGPRS Module, Model MC75, has or will be, uploaded into FCC web site by PCTEST or Siemens.

I trust this answers all known comments for the subject product and these three applications can now be granted.

Sincerely yours,

  
Richard Mullen  
Group Manager

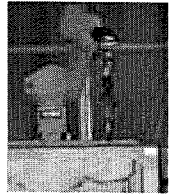
PCTEST ENGINEERING LABORATORY, INC.

6660 - B Dobbin Road • Columbia, MD 21045 • USA

Telephone 410.290.6652 / Fax 410.290.6654

http://www.pctestlab.com (email: randy@pctestlab.com)

CERTIFICATE OF COMPLIANCE (SAR EVALUATION)



APPLICANT NAME & ADDRESS:

Panasonic Corporation of North America
One Panasonic Way, 4B-8
Secaucus, NJ 07094

DATE & LOCATION OF TESTING:

Dates of Tests: June 10 & 13, 2005
Test Report S/N: 05006150439
Test Site: PCTEST Lab, Columbia MD
Project No.: ITPD-04-F106A

FCC ID:

ACJ9TGCF-183A

APPLICANT:

Panasonic Corporation of North America

EUT Type:

Notebook PC w/ WLAN and EGPRS

Tx/Rx Frequency:

2412 - 2462 MHz (DSSS/OFDM)
5180 - 5320 MHz / 5745 - 5825 MHz (OFDM)
824.20 - 848.80MHz (GSM850)/ 1850.20MHz - 1909.80MHz (GSM1900)

Max. RF Output Power:

16.13 dBm Peak Conducted (2.4 GHz DSSS/OFDM)
14.08 dBm Peak Conducted (5.8 GHz OFDM)
15.86 dBm Peak Conducted (5.2 GHz OFDM)

Max. SAR Measurement:

0.348 W/kg GSM850 Body SAR; 0.145 W/kg GSM 1900 Body SAR;
0.243 W/kg 802.11b Body SAR;
0.722 W/kg 802.11a (5300MHz) Body SAR;
0.780 W/kg 802.11a (5800MHz) Body SAR

Trade Name/Model(s):

CF-18mk3

FCC Classification(s):

Digital Transmission System (DTS)
Unlicensed National Information Infrastructure (NII)
Licensed Portable Transmitter Held to Ear (PCE)

FCC Rule Part(s):

§2.1093; FCC/OET Bulletin 65 Supplement C [July 2001]

Application Type:

Certification

Test Device Serial No.:

identical prototype [S/N: #DVT 3]

This wireless portable device has been shown to be capable of compliance for localized specific absorption rate (SAR) for uncontrolled environment/general population exposure limits specified in ANSI/IEEE Std. C95.1-1992 and had been tested in accordance with the measurement procedures specified in FCC/OET Bulletin 65 Supplement C (2001) and IEEE Std. 1528 - 2003.

I attest to the accuracy of data. All measurements reported herein were performed by me or were made under my supervision and are correct to the best of my knowledge and belief. I assume full responsibility for the completeness of these measurements and vouch for the qualifications of all persons taking them.

Grant Conditions: Output power listed is Conducted. SAR compliance for body-worn operating configuration is based on a separation distance of 0.0 cm between the bottom of the unit and the body of the user. End-users must be informed of the body-worn operating configurations for satisfying RF exposure compliance.

PCTEST certifies that no party to this application has been denied the FCC benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988, 21 U.S.C. 862.

Handwritten signature of Alfred Cirvianian

Alfred Cirvianian
Vice President Engineering

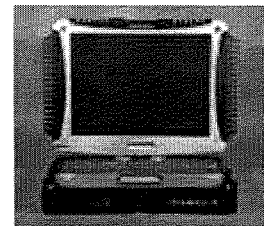
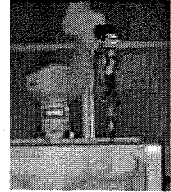


Table with 4 columns: PCTEST SAR REPORT, PCTEST FCC CERTIFICATION, Reviewed by: Quality Manager, and a page number field. It contains details like SAR Filename, Test Dates, Phone Type, and FCC ID.

AMENDED SAR TEST REPORT WITH ADDED 1.5cm LCD SIDE PANEL EXTENDERS. MEASUREMENT PERFORMED AT ZERO SPACING.

**PCTEST ENGINEERING LABORATORY, INC.**  
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<http://www.pctestlab.com> (email: [randy@pctestlab.com](mailto:randy@pctestlab.com))



### CERTIFICATE OF COMPLIANCE (SAR EVALUATION)

**APPLICANT NAME & ADDRESS:**

Panasonic Corporation of North America  
One Panasonic Way, 4B-8  
Secaucus, NJ 07094

**DATE & LOCATION OF TESTING:**

Dates of Tests: March 28-April 4, 2005  
Test Report S/N: 0502210122  
Test Site: PCTEST Lab, Columbia MD  
Project No.: ITPD-04-F106A

<b>FCC ID:</b>	<b>ACJ9TGCF-183A</b>
<b>APPLICANT:</b>	<b>Panasonic Corporation of North America</b>

**EUT Type:** Notebook PC w/ WLAN and EGPRS  
**Tx/Rx Frequency:** 2412 - 2462 MHz (DSSS/OFDM)  
 5180 - 5320 MHz / 5745 - 5825 MHz (OFDM)  
 824.20 - 848.80MHz (GSM850)/ 1850.20MHz - 1909.80MHz (GSM1900)  
**Max. RF Output Power:** 16.13 dBm Peak Conducted (2.4 GHz DSSS/OFDM)  
 14.08 dBm Peak Conducted (5.8 GHz OFDM)  
 15.86 dBm Peak Conducted (5.2 GHz OFDM)  
**Max. SAR Measurement:** 0.390 W/kg GSM850 Body SAR; 0.224 W/kg GSM 1900 Body SAR;  
 0.275 W/kg 802.11b Body SAR; 0.185 W/kg 802.11g Body SAR;  
 0.349 W/kg 802.11a (5300MHz) Body SAR;  
 0.582 W/kg 802.11a (5800MHz) Body SAR  
**Trade Name/Model(s):** CF-18mk3  
**FCC Classification(s):** Digital Transmission System (DTS)  
 Unlicensed National Information Infrastructure (NII)  
 Licensed Portable Transmitter Held to Ear (PCE)  
**FCC Rule Part(s):** §2.1093; FCC/OET Bulletin 65 Supplement C [July 2001]  
**Application Type:** Certification  
**Test Device Serial No.:** identical prototype [S/N: #DVT 3]

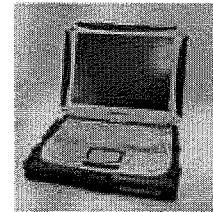
This wireless portable device has been shown to be capable of compliance for localized specific absorption rate (SAR) for uncontrolled environment/general population exposure limits specified in ANSI/IEEE Std. C95.1-1992 and had been tested in accordance with the measurement procedures specified in FCC/OET Bulletin 65 Supplement C (2001) and IEEE Std. 1528 - 2003.

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**Grant Conditions:** Output power listed is Conducted. SAR compliance for body-worn operating configuration is based on a separation distance of 0.0 cm between the bottom of the unit and the body of the user. End-users must be informed of the body-worn operating configurations for satisfying RF exposure compliance.

PCTEST certifies that no party to this application has been denied the FCC benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988, 21 U.S.C. 862.

  
Alfred Cirwitman  
Vice President Engineering



<b>PCTEST™ SAR REPORT</b>	<b>FCC CERTIFICATION</b>		<b>Reviewed by:</b> Quality Manager
<b>SAR Filename:</b> 0502210122	<b>Test Dates:</b> Mar. 28 - Apr. 4, 2005	<b>Phone Type:</b> Panasonic Notebook PC w/ WLAN and EGPRS	<b>FCC ID:</b> ACJ9TGCF-183A
			Page 1 of 38

→ OLD SAR TEST REPORT AT 1.5 CM AIR SPACING.