
Class II Permissive Change Letter

April 17, 2017
ITP-16-F011

Federal Communications Commission
Authorization and Standards Division
7435 Oakland Mills Road
Columbia, MD 21046 USA

Re: Class II Permissive Change Application for Panasonic Single Modular Model WL16A under FCC ID: ACJ9TGWL16A / Certified Under FCC Parts 15B, 15C and 15E for Installation within Panasonic Personal Computer Model CF-33
Addition of 2.4 GHz External Antenna and Co-Location with WWAN and Bluetooth Transmitters

To whom it may concern:

Pursuant to CFR§ 2.1043, Panasonic Corporation of North America hereby requests a Class II Permissive Change for its application with FCC ID: ACJ9TGWL16A, which was granted by UL Verification Services Inc.

This change represents:

- a) Adding 2.4GHz whip antenna with maximum antenna gain of 5dBi under FCC Part 15C (DTS).
The 2.4GHz whip antenna cannot be connected directly to Panasonic Host PC Model CF-33 and is always connected via Car Mounter. The 2.4GHz whip antenna is provided with the Car Mounter and is professionally installed only by person authorized by Panasonic. Also, the 2.4GHz whip antenna is intended for mounting on the rooftop of vehicle. Hence, a minimum 20cm separation between 2.4GHz whip antenna and user's body is maintained. Further, the 2.4GHz whip antenna is used instead of the laptop main internal antenna. The laptop Aux internal antenna is always operational. Although both antennas are not disabled in the 5GHz band, due to the electrical characteristic of the Car Mounter, 2.4GHz whip antenna transmission in the 5GHz band frequency is not supported. (i.e. connection cable has -10 dB loss at 5 GHz band). Hence, the operation of this external antenna is limited to only the 2.4GHz band.
- b) The Maximum Permissive Exposure (MPE) under FCC Part 15C (DTS) and 15E (NII) which demonstrates compliance for WL16A Module with FCC CFR 47 §1.1310 and 2.1091 for the collocated simultaneous transmission in mobile exposure conditions.

The MPE analysis is valid for transmitters operating within the parameters used for analysis.

This change does not affect the FCC part 15C (DSS) operation because Bluetooth does not use the external antenna or the FCC Part 15 (JBP) because of no changes to digital device.

In addition, we declare that the External antenna always requires professional installation. The External antenna can't be connected with Host PC Model CF-33 without the car mounter. The installation of the external antenna and the car mounter requires the professional knowledge of both vehicle and how to install special mounting tabs. For this reason, the external antenna and the car mounter can be installed only by the professional installers who Panasonic dealers hire and trained. Furthermore, the External antenna and the car mounter are exclusive products for corporates. These are not sold for general public, retailers or by mail order.

Tune up to operate with the same power setting as the target of original grant which date is March 13, 2017.

Sincerely,



Ben Botros
Project Manager
Panasonic Corporation of North America
Product Safety & Compliance Department