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RICHARD MULLEN
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Product Safety and Compliance Division

Attestation Statement for Proximity Sensor

March 19, 2013
ITP-12-F011D1

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

Re: Attestation Statement for Proximity Sensor
Class II Permissive Change Application for Panasonic Single Modular under FCC ID: ACJ9TGWW12C2
Certified Under FCC Parts 22H, 24E and 27
For Installation within Panasonic Personal Computer Model FZ-G1

This is to conform that the proximity sensor input is scanned continuously and the proximity detect event is not overridden by other CPU events (such as low RSSI, high packet loss rate, network power-up command, etc.) The manufacturing tolerance for the capacitor sensor is designed to ensure that the triggering distance is never smaller than the distance evaluated during SAR testing. A short description of how this is achieved is presented below:

- The sensor is sampled at a rate of 100ms intervals using three successive samplings requiring power reduction initiation.

- We ensure that the trigger distance for edge 1 is never less than 20mm and the trigger distance for the rear is never less than 10mm. For the rear we tested at 6mm which is more conservative than required by KDB616217.

- The proximity sensor triggering distance is determined by R and C values in the sensor. The values are adjusted to ensure that the triggering distance is never less than the minimum triggering distances specified in the SAR evaluation reports.

As shown in following figures, trigger distance (d) will be inspected in factory for the distance of edge1 and the rear in order to verify that the sensor performance meets the minimum triggering distance required.

In addition, product inspection will be done twice per year on two samples for EMC, SAR, etc in accordance with Panasonic's internal quality inspection process.

When installed in this host device the module operates at a maximum power level that is lower than the maximum power capability of the module as described in our C2PC request. This power level is factory configured to the settings detailed in the tune-up procedure and SAR report. These settings cannot be altered by the end user or the network.

When the proximity sensor has enabled the power reduction mode the maximum output power is reduced as described in both the tune-up procedure and SAR report. The reduced power levels are also factory configured and cannot be over-ridden.

For reference the maximum power levels, which do not account for MPR in LTE modes, and reduced power levels are attached. In LTE modes, when operating in the reduced power mode, MPR is disabled for cases where the (maximum power – MPR) exceeds the reduced power level and the output power is then limited to the reduced power level.

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The power table is attached for your reference.

Thank you for your attention in this matter.

Sincerely yours,

Richard Mullen

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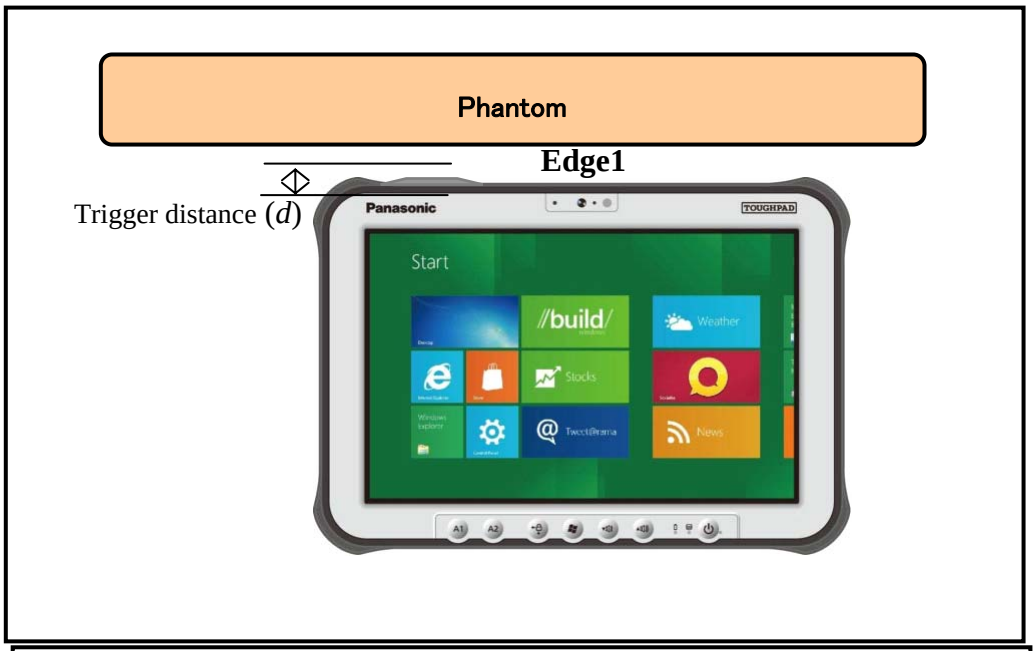

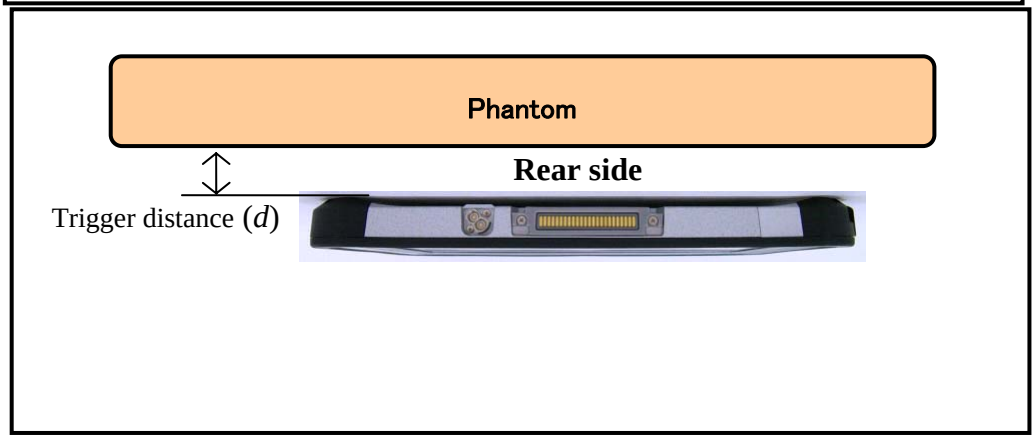

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APPENDIX

Module Power Settings (Power Reduction)

Tune-up Tolerance for all bands: +1.0dB / -1.0dB

GSM850/GSM1900

			GSMK				8PSK			
BAND	Ch	Freq	w/o Power Reduction	w/ Power Reduction	w/o Power Reduction	w/ Power Reduction	w/o Power Reduction	w/ Power Reduction	w/o Power Reduction	w/ Power Reduction
			1-Slot	1-Slot	2-Slot	2-Slot	1-Slot	1-Slot	2-Slot	2-Slot
GSM850	128	824.2	32.0	30.0	32.0	28.0	26.0	26.0	26.0	24.0
	190	836.6	32.0	30.0	32.0	28.0	26.0	26.0	26.0	24.0
	251	848.8	32.0	30.0	32.0	28.0	26.0	26.0	26.0	24.0
GSM1900	512	1850.2	29.0	23.0	29.0	24.0	25.0	21.0	25.0	22.0
	661	1880	29.0	23.0	29.0	24.0	25.0	21.0	25.0	22.0
	810	1909.8	29.0	23.0	29.0	24.0	25.0	21.0	25.0	22.0

			GSMK				8PSK			
BAND	Ch	Freq	w/o Power Reduction	w/ Power Reduction	w/o Power Reduction	w/ Power Reduction	w/o Power Reduction	w/ Power Reduction	w/o Power Reduction	w/ Power Reduction
			3-Slot	3-Slot	4-Slot	4-Slot	3-Slot	3-Slot	4-Slot	4-Slot
GSM850	128	824.2	N/A	N/A	N/A	N/A	26.0	23.0	26.0	22.0
	190	836.6	N/A	N/A	N/A	N/A	26.0	23.0	26.0	22.0
	251	848.8	N/A	N/A	N/A	N/A	26.0	23.0	26.0	22.0
GSM1900	512	1850.2	N/A	N/A	N/A	N/A	25.0	21.0	25.0	20.0
	661	1880	N/A	N/A	N/A	N/A	25.0	21.0	25.0	20.0
	810	1909.8	N/A	N/A	N/A	N/A	25.0	21.0	25.0	20.0

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UMTS

BAND	Mode	UL Ch No	Freq	Tx Conducted Pwr	
				w/o Power Reduction	w/ Power Reduction
UMTS (WCDMA) Band V	Rel 99 (RMC, 12.2 kbps)	4357	826.4	23.0	18.2
		4408	836.6	23.0	18.2
		4458	846.6	23.0	18.2
	HSDPA	4357	826.4	22.0	18.2
		4408	836.6	22.0	18.2
		4458	846.6	22.0	18.2
	HSUPA	4357	826.4	22.0	18.2
		4408	836.6	22.0	18.2
		4458	846.6	22.0	18.2
UMTS (WCDMA) Band II	Rel 99 (RMC, 12.2 kbps)	9262	1852.4	23.0	17.6
		9400	1880	23.0	17.6
		9538	1907.6	23.0	17.6
	HSDPA	9262	1852.4	22.0	17.6
		9400	1880	22.0	17.6
		9538	1907.6	22.0	17.6
	HSUPA	9262	1852.4	21.0	17.6
		9400	1880	21.0	17.6
		9538	1907.6	21.0	17.6

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LTE Band 4

LTE				Avg. Power	
Bandwidth	Ch	Freq.(MHz)	Mode	w/o Power Reduction	w/ Power Reduction
10MHz	2000	1715	QPSK	22.5	19.5
			16QAM	22.5	19.5
	20175	1732.5	QPSK	22.5	19.5
			16QAM	22.5	19.5
	20350	1750	QPSK	22.5	19.5
			16QAM	22.5	19.5
5MHz	19975	1712.5	QPSK	22.5	19.5
			16QAM	22.5	19.5
	20175	1733.8	QPSK	22.5	19.5
			16QAM	22.5	19.5
	20375	1755	QPSK	22.5	19.5
			16QAM	22.5	19.5

LTE Band 17

LTE				Avg. Power	
Bandwidth	Ch	Freq.(MHz)	Mode	w/o Power Reduction	w/ Power Reduction
10MHz	23789	709	QPSK	23.0	21.1
			16QAM	23.0	21.1
	23790	710	QPSK	23.0	21.1
			16QAM	23.0	21.1
	23800	711	QPSK	23.0	21.1
			16QAM	23.0	21.1
5MHz	23755	706.5	QPSK	23.0	21.1
			16QAM	23.0	21.1
	23790	710	QPSK	23.0	21.1
			16QAM	23.0	21.1
	23825	713.5	QPSK	23.0	21.1
			16QAM	23.0	21.1

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