

Federal Communications Commission

7345 Oakland Mills Road

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C.C.

Compliance Certification Services (UL CCS)

Subject: Additional explanation for Implementations of screen utility software to disable WWAN/WLAN

AVC Networks Company Panasonic Corporation

http://panasonic.net/avc/toughbook/

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functionality when the screen is selected by the user at portrait viewing position.

Replies for FCC Response_04272012

Reference: FCC ID: N7NMC7700 and FCC ID: N7NMC7750 WWAN Module

FCC ID: ACJ9TGWL11A WLAN module Panasonic tablet PC, Model Series: CF-C1

Attached: FCC Response 04272012.pdf

To whom it may concern:

We, the undersigned, are responsible to implement screen utility softwares, Rotation tool Version: 7.05L12M01 and Wireless switch tool version: 4.09L10M01, in Panasonic tablet host, model: CF-C1 when WWAN module FCC ID: N7NMC7700 or N7NMC7750 and/or WLAN module FCC ID: ACJ9TGWL11A are installed in the CF-C1 host.

We submitted the operational description which is named Display Rotation Tool For Panasonic PC CF-C1 Specification Rev. 1 (01/25/2012) on Jan. 27th. Regarding the FCC Response_04272012, we would like to state our answers as follows.

FCC7) We note that the FCC5) text was inserted mostly verbatim. Our apologies for being unclear; actually that was general concept text, and was not intended to be suitable for applicant-tailored actual instructions to be provided to users. FYI one way to better adjust wording to serve as user instructions could be the following.

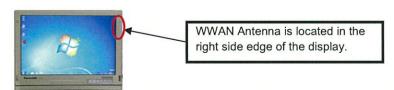
"...the antenna remains active and can be transmitting; in this condition, when positioning the edge with the antenna near persons (with the screen in orientation other than Secondary Portrait), to ensure compliance with FCC RF exposure requirements the specific edge of the device with the antenna (see diagrams below) must be maintained at 2.5 cm from all persons' bodies."

Same remarks also apply for this text used at pages 2 and 3 of the apr25 submission.

[Panasonic answer]

We corrected the wording as follows.

"In the "Never" (default setting: Transmitter always on, but screen rotation off for secondary portrait) condition, the antenna remains active and can be transmitting; in this condition, when positioning the edge with the antenna near persons (with the screen in orientation other than Secondary Portrait), to ensure compliance with FCC RF exposure requirements the right side edge of the display with the antenna (see diagram below) must be maintained at 2.5 cm from all persons' bodies."



Please see the modified draft of user manual.



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FCC8) The screen layouts in two of four of these diagrams seems confusing or incorrect, as follows. Primary-Landscape (PL) and Secondary-Portrait (SP) have desktop icons aligned at left edge, Taskbar at lower left, Notification at lower right; as expected. However Secondary-Landscape (SL) and Primary-Portrait (PP) appear to have these mirror / inverted, i.e., icons aligned right edge, etc; i.e. the user would see text backwards. As feasible / appropriate, please revise the SL and PP views to have objects positioned same as for PL and SP.

[Panasonic answer]

It was our mistaken. We revised SL and PP views. Please see page3 of the modified draft of user manual.

If you have any question, please feel free to contact us.

Isao Ogawa

Sincerely Yours,

MR.ISAO OGAWA / Senior Coordinator of Technical Regulations Team

IT Products Business Unit / Business solutions business Group, AVC Networks Company, Panasonic Corporation