

# Panasonic

Matsushita Mobile Communications Development Corporation of U.S.A.

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Date – 8.31.2000

FCC ID # NWJ10A002A

Applicant: Matsushita Mobile Communications Development Corporation of USA

Correspondence Reference Number: 15390

731 Confirmation Number: EA97534

To: Richard Fabina of the FCC,

After reviewing the data referred to in the request for information attaches below, I see the confusion. The measurements are stated in different modes like peak and average and measurements were done with power meters and spectrum analyzers. The inaccuracy between all of these is too large to reconcile and although all of the data should have been taken with the same units, it appears that different units were mistakenly measured. Panasonic apologizes for the confusion that this has caused.

In order to remedy this problem, we have contracted PCTest Engineering laboratories in Columbia, MD to retake the data for SAR on the head and body, radiated emissions, and radiated power all on one phone of each model. By using the same phone, there should be no question of correlation between the power levels used in each test. Included is a complete SAR report that should resolve questions 1 and 2. As you review the data, you will notice that the holster used in the body worn measurements for model EB-TX220 has an AT&T logo. Panasonic does not plan on selling a Panasonic branded holster for this model but we were aware that AT&T was. So in order to provide accurate body worn data for this model we used an AT&T holster. Panasonic in no way claims that we will certify and approve any third party vendors accessories to meet RF exposure guidelines because we have no control over who makes them or how they are made. We simply wanted to provide body worn data to the FCC.

In response to question number 3, we have included an attachment of the Operating Instructions safety section. In that you will see that we added the body worn statement to page 4. It still also appears in the accessory section of the OI. The correct maximum SAR values also appear on page 3 of the Safety Section.

Below is a list of uploaded attachments that satisfy the request for information copied below:

- 1) FCC SAR Measurement Report
- 2) FCC Part 24/22 ERP & EIRP Measurement Report
- 3) OI Safety Section 8.31.00
- 4) This letter - FCC Reply 15390

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To: Pieter Seidel, null  
**From: Richard Fabina**  
[rfabina@fcc.gov](mailto:rfabina@fcc.gov)  
FCC Application Processing Branch  
Re: FCC ID NWJ10A002A  
Applicant: Matsushita Mobile Communications Development Corporation of USA  
Correspondence Reference Number: 15390  
731 Confirmation Number: EA97534  
Date of Original E-Mail: 08/03/2000

1. Please review the output power summary on page 11 of one of the submitted files in the latest reply. The output power used in the SAR test is up to 1.1 dB lower than the output power used in the EMC tests for the AMPS mode. The output powers used in the SAR tests are more than 3 dB lower than those used in the EMC tests for the 800 MHz TDMA and PCS modes. Based on the SAR results, setting the conducted output power to the levels used in the EMC tests would cause the SAR limit to be exceeded.

The maximum output powers must not exceed those tested for SAR testing in order to maintain compliance. The maximum radiated output (ERP and EIRP) power to be used for the grant must be scaled accordingly with respect to those used in the SAR tests. Please confirm that production units will not exceed the following outputs: for model TX-210 - AMPS mode: 281 mW ERP, TDMA mode: 631 mW ERP and PCS mode: 57 mW EIRP; for model 220 - AMPS mode: 182 mW ERP, TDMA mode: 408 mW ERP and PCS mode: 57 mW EIRP.

2. The device shown in the body-worn SAR plots has its antenna on the wrong side and several of the PCS plots have peak SAR at the edge of the measurement boundary. Please clarify and, if necessary, repeat the measurement with expanded area(s) (DASY has updated software for measurements in cheek and jaw areas).
3. Please revise and relocate body-worn SAR statement and operating instructions. Currently, it is in the accessories section of the user's manual. Body-worn operating instructions and statements are generally placed in the front part of the manual in a conspicuous location where users can readily see it. These operating instructions and statements should: (1) caution the consumer to use the specific soft holster and leather-carrying case that has been tested for SAR compliance, and (2) warn that other similar accessories that have not been tested may not comply with FCC RF exposure

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requirements and using them should be avoided. Please upload the relevant page(s) of the revised user's manual and indicate their location.

For your information - The following are the proposed grant conditions at this point of the application processing:

Proposed Grant Conditions - Output is ERP for Part 22 and EIRP for Part 24. Device output for all operating modes must not exceed those tested for SAR compliance. SAR compliance for body-worn operating configurations is limited to the specific soft-holster and leather-carrying case tested for this filing. End-users must be informed of the body-worn operating requirements for satisfying RF exposure compliance.

The highest reported SAR values for devices authorized under this FCC ID are:

AMPS mode (Part 22) - Head: 1.40 W/kg, Body-worn: 1.36 W/kg

PCS mode (Part 24) - Head: 1.41 W/kg, Body-worn: 0.48 W/kg (may change)

The items indicated above must be submitted before processing can continue on the above referenced application. Failure to provide the requested information within 60 days of the original e-mail date may result in application dismissal pursuant to Section 2.917 © and forfeiture of the filing fee pursuant to section 1.1108.

DO NOT reply to this e-mail by using the Reply button. In order for your response to be processed expeditiously, you must upload your response via the Internet at [www.fcc.gov](http://www.fcc.gov), Electronic Filing, OET Equipment Authorization Electronic Filing. If the response is submitted through Add Attachments, in order to expedite processing, a message which informs the processing staff that a new exhibit has been submitted must also be submitted via Submit Correspondence. Also, please note that partial responses increase processing time and should not be submitted.

Any questions about the content of this correspondence should be directed to the e-mail address listed below the name of the sender.