



Panasonic Mobile Communications Development of Europe Limited

22nd February 2007

Telecommunication Certification Body
Radio Frequency Investigation Ltd.
Ewhurst Park
Ramsdell
Basingstoke
Hampshire
RG26 5RQ

Dear Sir,

Subject: FCC Class II Permissive Change Application to VS70; FCC ID: UCE206001A

I would like to submit our application for acceptance of an FCC Class II Permissive Change to the above previously certified PCS1900 mobile handset model VS70.

The reason for the change application is the addition of a cosmetic variant model known as VS70A. The VS70A is electrically identical to the parent VS70 but incorporating a redesigned upper clam-shell outer cover and alternative case colours, but otherwise identical except for printing and labelling. There are no electrical differences. The Software naming string has been changed only to reflect the new model number.

As a result of the changes, CFR 47 Pt 24/ Pt 15.247 radiated performance and SAR was re-measured to determine the impact of the changes. The test reports revealed an overall reduction in both PCS and Bluetooth EIRP with some fluctuation in the radiated emissions performance, however there was a significant increase in SAR prompting this application.

I also attach the following documents in support of this application:

- External photographs
- User Manual
- ID Label/ Location drawing
- Pt 24/ Pt 15.247/ SAR Test Reports

Please advise if any further information is required.

Yours sincerely

Mike Hargreaves
PRINCIPAL ENGINEER, Regulations & Approvals
Panasonic Wireless Design (PMCDE)