



Panasonic Mobile Communications Development of Europe Limited

29th October 2008

Telecommunication Certification Body
RFI Global Services Ltd.
Pavilion A
Ashwood Park
Basingstoke
Hampshire
RG23 8BG
United Kingdom

Subject: Class II Permissive Change under FCC Part 22, Subpart H and Part 24, Subpart E.
Product: P-01A UMTS/ GSM Cellular Mobile Telephone
FCC ID: UCE208009A

Dear Sir or Madam,

Panasonic herewith files an application for a Class II permissive change for the P-01A cellular mobile telephone previously approved under the above FCC ID.

The reason for the change is to optimise the manufacturing process where it was found that the length of the co-axial cable connecting between two PCBs in either half of the clam-shell design handset was insufficient for reliable assembly. In some cases the cable was pulled forcibly and caused a disconnection to occur at the other end of the cable. The actual change adjusts the surplus length of the cable by changing the relationship between the inner conductors and the outer screen by 1.5mm. The total length of the two cable elements has not changed.

This change influenced the antenna characteristics and so it was necessary to re-optimize the antenna matching circuitry and band V antenna gain. The attached document "Cable and Antenna Matching Change.xls" contains the details.

As a result of these changes to the telephone, Panasonic arranged a complete SAR retest even though the changes resulted in no significant change in the output power level that was listed on the original grant. The power levels of the modified telephone can be seen in the filed SAR test report. Revised schematics and BOM have been submitted showing the changes in components. The changes are not visibly discernable and so the photographs have not been revised.

Panasonic requests that this request is accepted and the Grant is re-issued pursuant to this Class II permissive change application.

Yours faithfully

Mike Hargreaves
Principal Engineer, Regulations and Approvals