

January 6, 2005

ITPD-04-F111A, -F111B

WLAN Part 15C / Equip Class DTS: EA878593

WLAN Part 15E / Equip Class NII: EA366610

Federal Communications Commission  
7435 Oakland Mills Road  
Columbia, MD 21046 USA

Subject: Authority to Act as FCC Agent and Request for Confidentiality Panasonic Portable Notebook Computer Model CF-51 Family with Intel WLAN / FCC Certification for FCC ID: ACJ9TGCF-512

To Whom It May Concern:

On behalf of Panasonic Corporation of North America, we herby authorize PCTEST Engineering Laboratory, Inc., to act on our behalf in matters relating to FCC equipment authorization, including the signing of documents relating to these matters. Any and all acts carried out by PCTEST on our behalf shall have the same effect as acts of our own.

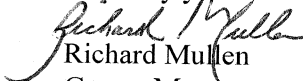
In accordance with provisions of Section 0.457(d) of the Commission's Rules and Section 552(b)(4) of the Freedom of Information Act, we request confidentiality for WLAN exhibits for Operation Description, Parts Lists, Block Diagram(s) and Schematic Diagram(s). The WLAN transmitter is not user adjustable and does not have a Tune-Up Procedure. These exhibits contain proprietary, confidential and trade secrets material, which would not be routinely made available for public inspection.

This project represents Portable Notebook Computer Model CF-51 Family (CF-51mk2) to be marketed under FCC ID: ACJ9TGCF-512. This product will be marketed with: (1) CPU types Pentium-M-1.7 or 2GHz; (2) Intel WLAN (a+b+g) Module Model WM3B2915ABG with Part 15C operation within 2412~2462 and 5745~5825 MHz at 233 and 103 mW peak conducted RF output power; and Part 15E operation within 5180~5240 and 5260~5320 MHz at 54 and 125 mW peak conducted RF output. Maximum measured SAR values are 0.068 W/kg Laptop Body and 0.712 W/kg Bystander Body measured at 0.5 cm pacing. Summary of transmitter related specifications:

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|-------------------------------------------------------------------------------------|-------------|
| (1) Part 15C DTS (b) operation within 2412~2462 MHz at 77mw peak conducted          | (18.85 dBm) |
| (2) Part 15C DTS (g) operation within 2412~2462 MHz at 233mW peak conducted         | (23.67 dBm) |
| (3) Part 15C DTS (a) operation within 5745~5825 MHz at 103mW peak conducted         | (20.14 dBm) |
| (4) Part 15E NII (low band) operation within 5180~5240 MHz at 54mW peak conducted   | (17.36 dBm) |
| (5) Part 15E NII (high band) operation within 5260~5320 MHz at 125mW peak conducted | (20.96 dBm) |

This PC's keyboard contains WLAN Main TX//RX Inverted F type antenna with 4.56dBi antenna gain and WLAN Aux TX/RX antenna with 3.59dBi antenna gain. This product may be marketed with optional Port Replicator Model CF-VEB511, which does not contain any external antenna connector. The basic User Manual contains all general FCC warning notices, including RF exposure warning notices, which includes notice that PC was approved for portable operation and unless otherwise advised in separate supplemental instructions for individual wireless transmitter(s), requires minimum 1.5 cm spacing. The separate provided WLAN User Manual gives additional warning notice about NII operation.

Sincerely yours,

  
Richard Mullen  
Group Manager