

Matsushita Electric Corporation of America

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January 18, 2001
KMTDKM4-00-U60C

Re:	FCC ID: ACJ96NKX-TR325
Applicant:	Matsushita Electric Industrial Co., Ltd.
Correspondence Ref No:	17669
731 Confirmation Number:	EA99026
Type Product:	FCC Part 95 / Family Radio Service Face Held Radio

Attn.: Joe Dichoso,

This is in response to your correspondence dated January 10 and my visit to your facility on January 16, at which time I meet with your Ray La Forge and Kwok Chan.

The Original Application’s test report supported this FRS effective radiated power (ERP) was 0.398 watts; and its SAR test report also supported the ERP was 0.398 watts. The original grant agreed and reported the output wattage was 0.398 watts. It appears your Andy Leimer amended the original grant to reflect 0.279 watts, which appears to reflect the current Class II Change Application with test results that indicated the conducted power was 0.394 watts and ERP was 0.279 watts.

Regarding the current Class II Change Application, the proposed changes involve change in the receiving antenna filter; and change to transmitter amplifier circuitry’s RF unit FET from type TRF7003PKR to type NE5510279A. This alternate FET is equivalent to the original with same specifications, but has different shape and artwork. Frankly speaking, we believe this change could fall within scope of Class I Change, but we reported due to change in shape/appearance of RF unit FET. Further, we believe the original reported ERP of 0.398 watts (25.9 dBm) and the current reported ERP of 0.279 watts (24.4 dBm) represents a difference of only 1.5 dB, which can fall within acceptable measurement uncertainty and production lot variation without being considered a reduction in maximum output power that would require a new application and a new FCC ID.

Regarding SAR test report, we understood from discussion with Kwok Chan that he would not have a problem it accept the first SAR test report and would not require any repeat SAR test report for this minor change. This is because the existing SAR test report shows acceptable test results with zero antenna spacing between both head/ear and body with worst-case test results to be 1.27 W/kg for brain and 1.08 W/kg for body.

Please reconsider the above explanation and advise if FCC can accept this proposed change as a Class II Change and not require a new application with a new FCC ID. Thank you for your attention and understanding in this matter.

Sincerely yours,

Richard Mullen
Group Manager
Product Safety & Compliance Division

Cc: Richard Fabina / Andy Leimer / Ray La Forge / Kwon Chan / FCC-OET
K. Nawata / KME-KMTDKM4