

Amended October 20, 2004
ITPD-04-F104A, F104B
WLAN Part 15C: EA205945
WLAN Part 15E: EA726507

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

Subject: Authority to Act as FCC Agent and Request for Confidentiality Panasonic Personal Computer
Model CF-18 Family with Intel WLAN / FCC Certification for FCC ID: ACJ9TGCF-181A

To Whom It May Concern:

On behalf of Applicant Matsushita Electric Industrial Co., Ltd. and their agent Matsushita Electronic Corporation of America, we hereby 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.

This project represents Portable Personal Computer Model CF-18 Family to be marketed under FCC ID: ACJ9TGCF-181A. This product will be marketed with: (1) CPU type Pentium-M-1.1 GHz; and (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. The maximum worst-case measured SAR test result was 1.180 W/kg Bystander Body at 1.5 cm spacing.

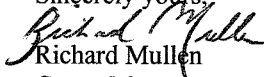
- (1) Part 15C DTS (b) operation within 2412~2462 MHz at 18.85 dBm peak conducted (77 mW)
- (2) Part 15C DTS (g) operation within 2412~2462 MHz at 23.67 dBm peak conducted (233 mW)
- (3) Part 15C DTS (a) operation within 5745~5825 MHz at 20.14 dBm peak conducted (103 mW)
- (4) Part 15E NII (low band) operation within 5180~5240 MHz at 17.36 dBm (54 mW)
- (5) Part 15E NII (high band) operation within 5260~5320 MHz at 20.96 dBm (125mW)
- (6) Maximum SAR was 0.034 W/kg Laptop Body at zero spacing; and 1.180 W/kg Bystander Body at 1.5 cm spacing.

This PC contains WLAN Main TX/RX Inverted F type antenna has 1.42 dBi antenna gain and the WLAN Aux TX/RX antenna has 2.59 dBi antenna gain. Also, it may be marketed with optional Car Mounter Model NP-CF18, which contains two unique external antenna connectors for recommended professional installation. One antenna connector is for connection of licensed CDMA or GPRS antenna and the other is for Radiall/Larsen for WLAN antenna, type MS3E2400TNC. This WLAN antenna has 3dBi omni directional antenna gain and magnet roof mounted base.

The PC's main User Manual gives all FCC required notices and warning, including general RF Exposure Warning. The provided Supplemental User Manual for WLAN gives following type additional notice for NII operation: "This product is restricted to indoor use due to its operation in the 5.15 to 5.25 GHz frequency range. FCC requires this product to be used indoors for the frequency range 5.15 to 5.25 GHz to reduce the potential for harmful interference to co-channel Mobile Satellite Systems. High power radars are allocated as primary uses of the 5.25 to 5.35 GHz and 5.65 to 5.85 GHz bands. These radar stations can cause interference with and/or damage this product."

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 both transceivers' exhibits for Operation Description, Parts Lists and Tune-Up Procedure, Block Diagram(s) and Schematic Diagram(s). The WLAN 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.

Sincerely yours,


Richard Mullen
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