

December 10, 2004
ITPD-04-F104A, -F104B
WLAN Part 15C for DTS: EA205945
WLAN Part 15E for NII: EA726507

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

Attn: Stan Lyles / Martin Perrine / FCC Application Processing Branch
FCC ID: ACJ9TGCF-181A
Applicant: Matsushita Electric Industrial Co., Ltd.
CFN: 28161 and 28162
731 Confirm: EA205945 and EA726507
Type Product: Portable Notebook Computer Model CF-18 With Intel WLAN(a+b+g)

Dear Sirs,

Please note response to your comment issued on December 6, 2004.

Portable Notebook Computer Model CF-18 Family may be marketed with various co-located transmitters and have been, and/or will be, granted under various individual FCC ID's for various PC/TX configurations. This includes combinations of various transmitters such as BT, WLAN, CDMA, CDMA-EVDO, GPRS and/or GPS-EDGE. Also, the basic CF-18 may be configured to have 1 or 2 external unique antenna passive pass-thru connectors and expansion bus on its bottom enclosure for insertion into optional Car Mounter Model NP-CF18 or Port Replicator Model CF-VEB181.

The optional Car Mounter and Port Replicator may be configured to have 1 or 2 matching unique antenna passive pass-thru connectors, which would be hard-wired connected to its rear panel's 1 or 2 external TNC antenna connectors. Depending upon exact PC configuration, the WLAN external antenna connector may be connected to recommended Radiall/Larsen WLAN antenna, type MS3E2400TNC with 3 dBi antenna gain. The other antenna connector is intended for connection to licensed radio service external antenna. Supplemental instructions will be provided for licensed radio transmitter with recommended external antenna maximum antenna dBi gain.

FCC Comment:

Regarding your answer to question 1, photos of the cable and antenna that will be provided with this option could not be located - please provide. Also please justify that TNC connector on the rear of the "mounter" is unique and meets requirements of 15.203.

Answer:

We uploaded photos of combination CF-18, Car Mounter and WLAN antenna. Regarding meeting unique external antenna connector requirements, please note the following explanation and possible countermeasures:

Presently, this CF-18 Family is not marketed to the general consumer. Instead it is presently marketed to only commercial customers such as police, fire and military. As such, we believe it is reasonable to accept whenever it is used with optional Car Mounter that any installed external antenna(s) will be installed by professional installer, who will understand and follow our provided installation instructions. Please confirm this is acceptable for this exact application for this exact product configuration.

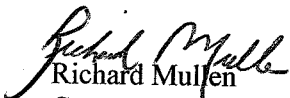
To consider in the future that CF-18 Family may expand its marketing to the general consumer, we understand we must make countermeasure to Car Mounter's external WLAN antenna connector to make it unique.

Please confirm if either of the below suggested countermeasures would satisfy compliance with Section 15.203:

1. Whenever optional Car Mounter is sold with WLAN external TNC antenna connector, the installation instructions will advise it must be used with only Radiall/Larsen WLAN antenna, type MS3E2400TNC with 3 dBi gain. Also, the installation kit will provide instructions and strong glue to use on TNC threads after installation to make it permanently attached.
2. At earliest opportunity, modify Car Mounter external WLAN TNC connector to make is reverse polarity and contract vendor to make external WLAN antenna with reverse polarity TNC connector.

I trust this answers your outstanding comments. Thank you for your continued cooperation.

Sincerely yours,



Richard Mullen
Group Manager

Matsushita Electric Corporation of America
Product Safety & Compliance Division