

June 28, 2005

ITPD-04-F108A: BT Part 15C / DSS / EA129212

ITPD-04-F1086B: WLAN Part 15C / DTS / EA634260

ITPD-04-F108C: WLAN Part 15E / NII / EA764942

ITPD-04-F108D: EGPRS Parts 22H, 24E / PCB / EA836290

To: Diane Poole
Applicant: Panasonic Corporation of North America
FCC ID: ACJ9TGCF-185A
731 Confirmation No: EA129212, EA634260, EA764942 and EA836290
Correspondence No: 28952, 28936, 28954 and 28953
Product: Panasonic Notebook Computer Model CF-18mk3 Family

This is in response to the above mentioned correspondences dated May 16, 2005, various telephone conversations and face-to-face meeting with FCC.

1. This is in response to the subject product when used in tablet mode does not provide adequate spacing between the LCD side panels and user's body to satisfy RF exposure evaluation. We considered FCC's comment, which suggested "we encourage consideration of source-based duty factors where justifiable, or selective transmitter disabling or power reductions." At this point-in-time, it is not possible to consider selective transmitter disabling and/or power reduction. However, in the future we may want to use source-based duty cycle correction factors, but we will need time to study and come to agreement on exactly how to justify, test and/or calculate. To satisfy FCC's immediate concern, we have agreed to modify the subject product's outer enclosure to add permanently attached LCD side panel extenders, which in affect will increase the spacing between the internal antennas and user body by an additional 1.5 cm spacing. Under separate cover will submit additional SAR Test Report with added plastic spacers, which had minor influence upon past reported SAR Test Report performed on the higher 5 GHz frequency range with 1.5 cm air spacing. Also, we will submit photographs of these added side panel extenders.

The maximum worse-case SAR measurements with 1.5 cm air spacing was: 0.403 W/kg GSM850 Body SAR; 0.214 W/kg GSM 1900 Body SAR; 0.301 W/kg 802.11b Body SAR; 0.180 W/kg 802.11g Body SAR; 0.362 W/kg 802.11a (5300 MHz) Body SAR; and 0.567 W/kg 802.11a (5800 MHz) Body SAR.

The maximum worse-case SAR measurements with added 1.5 cm LCD side panel extenders and zero air spacing was: 0.345 W/kg GSM850 Body SAR; 0.157 W/kg GSM 1900 Body SAR; 0.263 W/kg 802.11b Body SAR; 0.716 W/kg 802.11a (5300 MHz) Body SAR; and 0.782 W/kg 802.11a (5800 MHz) Body SAR.

I trust this answers all known comments for the subject product and these three applications can now be granted.

Sincerely yours,


Richard Mullen
Group Manager

ITPD-05-F108A-B-C-D

PCTEST ENGINEERING LABORATORY, INC.
6660 - B Dobbin Road • Columbia, MD 21045 • USA
Telephone 410.290.6652 / Fax 410.290.6654
<http://www.pctestlab.com> (email: randy@pctestlab.com)
CERTIFICATE OF COMPLIANCE (SAR EVALUATION)



APPLICANT NAME & ADDRESS:

Panasonic Corporation of North America
One Panasonic Way, 4B-8
Secaucus, NJ 07094

DATE & LOCATION OF TESTING:

Dates of Tests: June 10 & 13, 2005
Test Report S/N: 0506150441
Test Site: PCTEST Lab, Columbia MD
Project No.: ITPD-04-F108A

FCC ID:

ACJ9TGCF-185A

APPLICANT:

Matsushita Electric Industrial Co., Ltd.

EUT Type:

Notebook PC w/ WLAN, EGPRS and Bluetooth

Tx/Rx Frequency:

2412 - 2462 MHz (DSSS/OFDM)
5180 - 5320 MHz / 5745 - 5825 MHz (OFDM)
824.70 - 848.31 MHz (CDMA)/1851.25 - 1908.75 MHz (PCS CDMA)

Max. RF Output Power:

16.13 dBm Peak Conducted (2.4 GHz DSSS/OFDM)
14.08 dBm Peak Conducted (5.8 GHz OFDM)
15.86 dBm Peak Conducted (5.2 GHz OFDM)

Max. SAR Measurement:

0.345 W/kg GSM850 Body SAR; 0.157 W/kg GSM 1900 Body SAR;
0.263 W/kg 802.11b Body SAR;
0.716 W/kg 802.11a (5300MHz) Body SAR;
0.782 W/kg 802.11a (5800MHz) Body SAR

Trade Name/Model(s):

CF-18mk3

FCC Classification(s):

Digital Transmission System (DTS)
Unlicensed National Information Infrastructure (NII)
Licensed Portable Transmitter Held to Ear (PCE)

FCC Rule Part(s):

§2.1093; FCC/OET Bulletin 65 Supplement C [July 2001]

Application Type:

Certification

Test Device Serial No.:

identical prototype [S/N: #DVT 3]

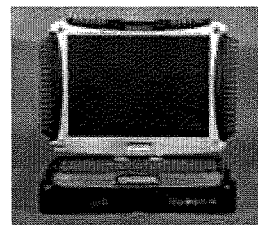
This wireless portable device has been shown to be capable of compliance for localized specific absorption rate (SAR) for uncontrolled environment/general population exposure limits specified in ANSI/IEEE Std. C95.1-1992 and had been tested in accordance with the measurement procedures specified in FCC/OET Bulletin 65 Supplement C (2001) and IEEE Std. 1528 - 2003.

I attest to the accuracy of data. All measurements reported herein were performed by me or were made under my supervision and are correct to the best of my knowledge and belief. I assume full responsibility for the completeness of these measurements and vouch for the qualifications of all persons taking them.

Grant Conditions: Output power listed is Conducted. SAR compliance for body-worn operating configuration is based on a separation distance of 0.0 cm between the bottom of the unit and the body of the user. End-users must be informed of the body-worn operating configurations for satisfying RF exposure compliance.

PCTEST certifies that no party to this application has been denied the FCC benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988, 21 U.S.C. 862.


Alfred Cirwinian
Vice President Engineering



PCTEST™ SAR REPORT		FCC CERTIFICATION		Reviewed by:
SAR Filename: 0506150441		Test Dates: June 10 & 13, 2005	Phone Type: Panasonic Notebook PC w/ WLAN, EGPRS and Bluetooth	Quality Manager
			FCC ID: ACJ9TGCF-185A	Page 1 of 25

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→ ATTENDED SAR TEST REPORT WITH ADDED 1.5 CM LCD SIDE PANEL SPACERS.
MEASUREMENT PERFORMED AT ZERO AIR SPACING.

ITPD-05-F108A-B-C, -D

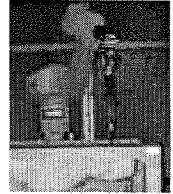
PCTEST ENGINEERING LABORATORY, INC.

6660 - B Dobbin Road • Columbia, MD 21045 • USA

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CERTIFICATE OF COMPLIANCE (SAR EVALUATION)



APPLICANT NAME & ADDRESS:

Panasonic Corporation of North America
One Panasonic Way, 4B-8
Secaucus, NJ 07094

DATE & LOCATION OF TESTING:

Dates of Tests: March 28-April 4, 2005
Test Report S/N: 0502210127
Test Site: PCTEST Lab, Columbia MD
Project No.: ITPD-04-F108A

FCC ID:

ACJ9TGCF-185A

APPLICANT:

Matsushita Electric Industrial Co., Ltd.

EUT Type:

Notebook PC w/ WLAN, EGPRS and Bluetooth

Tx/Rx Frequency:

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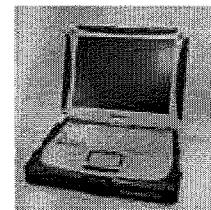
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Alfred Cirvillian

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Vice President Engineering



PCTEST™ SAR REPORT		FCC CERTIFICATION		Reviewed by:
SAR Filename: 0502210127		Test Dates: Mar. 28 - Apr. 4, 2005	Phone Type: Panasonic Notebook PC w/ WLAN, EGPRS and Bluetooth	Quality Manager
			FCC ID: ACJ9TGCF-185A	Page 1 of 41

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→ OLD SAR TEST REPORT WITH 1.5 CM AIR SPACE