

October 3, 2006
ITPD-06-F016A: BT Part 15C / DSS / EA923977
ITPD-06-F016B: WLAN Part 15C / DTS / EA566553

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

Subject: Authority to Act as FCC Agent for Panasonic Toughbook Computer, Model CF-19 Family
with Taiyo Bluetooth and Intel WLAN(a+b+g) / FCC Certification for FCC ID: ACJ9TGCF-191

To Whom It May Concern:

On behalf of Panasonic Corp. of North 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 Panasonic Portable Toughbook Computer, Model CF-19 Family with Intel Core Duo 1.06 GHz and Tablet LCD, without side panel spacers, to be marketed under FCC ID: ACJ9TGCF-191.

Under this filing, the Intel WLAN's Part 15E Unlicensed National Information Infrastructure (U-NII) three frequency band capabilities have been disabled. The U-NII feature will not be enabled until after a FCC certified access point becomes available on the marketplace to enable performance of DFS tests while our end-product operates in the client mode without radar detection function. The DFS test reports will then be filed under a Class II Permissive Change application. This product will be marketed with the following co-located transmitters:

(1) Taiyo Yuden Bluetooth, Model EYS1CSMX (Taiyo Yuden has no FCC ID):

<u>FCC Rule Part</u>	<u>Type</u>	<u>Freq Range (MHz)</u>	<u>Output Watts</u>
Part 15C	DSS	2402~2480	0.019

(2) Intel WLAN (a+b+g), Model WM3945ABG (Intel FCC ID: PD9WM3945ABG)

<u>FCC Rule Part</u>	<u>Type</u>	<u>Freq Range (MHz)</u>	<u>Output Watts</u>
Part 15C	802.11(b)	2412~2462	0.0266
Part 15C	802.11(g)	2412~2462	0.0294
Part 15C	802.11(a)	5745~5825	0.0266

The highest reported SAR values measured without LCD spacers was 0.169 W/kg 802.11b Body SAR (Bystander at 1.5 cm spacing); 0.147 W/kg 802.11g Body SAR (Bystander at 1.5 cm spacing); 0.459 W/kg 802.11a Body SAR (Bystander at 1.5 cm spacing); and 0.883 W/kg 802.11a Bluetooth Body SAR (Tablet at zero spacing).

This PC contains the following Inverted-F type transmitter antennas, which are all located within the LCD panel: (1) BT TX/RX antenna with 3.06 dBi antenna gain; and (2) WLAN Main TX/RX and Aux TX/RX antennas with 2.48 dBi and 3.31 dBi antenna gains. The PC's main User Manual gives all FCC required notices and warning, including RF Exposure Warning.

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 permanent confidentiality for transmitter's exhibits, which contain Operation Description, Parts Lists & Tune-Up Procedure, Block Diagram and Schematic Diagram. The Bluetooth and WLAN transmitters are not user adjustable and do 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. Also, in accordance with FCC Public DA 04-1705, we request short-term confidentiality for exhibits, which contain External Photographs, Internal Photographs, Test Setup Photographs and the User Manual. These exhibits contain pre-market information, which could give our competitors unfair advantage should this information be released before this product is actually introduced into the common marketplace.

Sincerely yours,

Richard Mullen

Richard Mullen
Group Manager