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RF EXPOSURE EVALUATION (MAXIMUM PERMISSIBLE EXPOSURE)

Applicant Name:

Panasonic Corporation of North America

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United States

Date of Testing:

May 3, 2010

Test Site/Location:

PCTEST Lab, Columbia, MD, USA

Test Report Serial No.:

0Y1003170441.ACJ

FCC ID: ACJ9TGCF-19D

IC CERTIFICATION NO: 216A-CF19D

APPLICANT: Panasonic Corporation of North America

EUT Type: Toughbook Model: CF-19

Model(s): CF-19

IC Model(s): CF-19D

FCC Rule Part(s): FCC Part 1 (§1.1310) and Part 2 (§2.1091)

FCC Classification: PCS Licensed Transmitter (PCB)

Test Procedure: OET Bulletin 65

The device bearing the FCC Identifier specified above has been shown to comply with the applicable technical standards as indicated in the measurement report and has been tested in accordance with the measurement procedures specified in FCC OET Bulletin 65 (See Test Report). These measurements were performed with no deviation from the standards. Test results reported herein relate only to the item(s) tested.

I authorize and 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.

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.


Randy Ortanez
President



FCC ID: ACJ9TGCF-19D		MAXIMUM PERMISSIBLE EXPOSURE (MPE) DATA REPORT 	Reviewed by: Quality Manager
Test Report S/N: 0Y1003170441.ACJ	Test Dates: May 3, 2010	EUT Type: Toughbook Model: CF-19	Page 1 of 8

TABLE OF CONTENTS

1.0	RF EXPOSURE EVALUATION – MAXIMUM PERMISSIBLE EXPOSURE (MPE).....	3
1.1	INTRODUCTION.....	3
1.2	EUT DESCRIPTION	4
1.3	MPE REQUIREMENTS OVERVIEW	5
1.4	PROCEDURE.....	6
1.5	SUMMARY OF RESULTS.....	7
2.0	CONCLUSION	8

FCC ID: ACJ9TGCF-19D		MAXIMUM PERMISSIBLE EXPOSURE (MPE) DATA REPORT 	Reviewed by: Quality Manager
Test Report S/N: 0Y1003170441.ACJ	Test Dates: May 3, 2010	EUT Type: Toughbook Model: CF-19	Page 2 of 8

1.0 RF EXPOSURE EVALUATION – MAXIMUM PERMISSIBLE EXPOSURE (MPE)

1.1 Introduction

This document is prepared on behalf of Panasonic Corporation of North America to show compliance with the RF Exposure requirements as required in §1.1310 of the FCC Rules and Regulations and RSS-102 of Industry Canada.

The limit for Maximum Permissible Exposure (MPE), specified in FCC §1.1310, is listed in Table 1-1. According to FCC §1.1310 and RSS-102: the criteria listed in the following table shall be used to evaluate the environmental impact of human exposure to radio-frequency (RF) radiation as specified in §1.1307(b).

Frequency Range (MHz)	Electric Field Strength (V/m)	Magnetic Field Strength (A/m)	Power Density (mW/cm ²)	Average Time (Minutes)
(A) Limits For Occupational / Control Exposures (f = frequency)				
30-300	61.4	0.163	1.0	6
300-1500	...	...	f/300	6
1500-100,000	...	...	5.0	6
(B) Limits For General Population / Uncontrolled Exposure (f = frequency)				
30-300	27.5	0.073	0.2	30
300-1500	...	...	f/1500	30
1500-100,000	...	...	1.0	30

Table 1-1. Limits for Maximum Permissible Exposure (MPE)

FCC ID: ACJ9TGCF-19D		MAXIMUM PERMISSIBLE EXPOSURE (MPE) DATA REPORT		Reviewed by: Quality Manager
Test Report S/N: 0Y1003170441.ACJ	Test Dates: May 3, 2010	EUT Type: Toughbook Model: CF-19		Page 3 of 8

1.2 EUT Description

The Panasonic Model: CF-19D is a Toughbook containing Sierra Wireless GSM/WCDMA/CDMA/EvDO WWAN, Intel PRO/Wireless WLAN and UNII, and Alps Bluetooth modules. For this MPE evaluation the device is set to transmit from the antenna of each transmitter and the RF exposure of each transmitter is evaluated individually. This device also has a car-mounting (Model:CF-WEB184) option which allows for external antennas for use with the 2.4GHz WLAN operation and the WWAN operation.

EUT:

Model: CF-19D
 Grantee: Panasonic Corporation of North America
 FCC ID: ACJ9TGCF-19D
 Antenna Gains: External Antenna

Frequency	Main
2.4 GHz	5 dBi

Output Power:

WLAN Chain A (2.4GHz)	14.72 dBm
WLAN Chain B (2.4 GHz)	14.22 dBm
WLAN Chain A (5.8 GHz)	14.35 dBm
WLAN Chain B (5.8 GHz)	12.92 dBm

FCC ID: ACJ9TGCF-19D		MAXIMUM PERMISSIBLE EXPOSURE (MPE) DATA REPORT 	Reviewed by: Quality Manager
Test Report S/N: 0Y1003170441.ACJ	Test Dates: May 3, 2010	EUT Type: Toughbook Model: CF-19	Page 4 of 8

1.3 MPE Requirements Overview

Three different categories of transmitters are defined by the FCC in OET Bulletin 65. These categories are fixed installation, mobile, and portable and are defined as follows:

- o **Fixed Installations:** fixed location means that the device, including its antenna, is physically secured at a permanent location and is not able to be easily moved to another location. Additionally, distance to humans from the antenna is maintained to at least 2 meters.
- o **Mobile Devices:** a mobile device is defined as a transmitting device designed to be used in other than fixed locations and to be generally used in such a way that a separation distance of at least 20 centimeters is normally maintained between the transmitter's radiating structures and the body of the user or nearby persons. Transmitters designed to be used by consumers or workers that can be easily re-located, such as a wireless modem operating in a laptop computer, are considered mobile devices if they meet the 20 centimeter separation requirement. The FCC rules for evaluating mobile devices for RF compliance are found in 47 CFR §2.1091.
- o **Portable Devices:** a portable device is defined as a transmitting device designed to be used so that the radiating structure(s) of the device is/are within 20 centimeters of the body of the user. Portable device requirements are found in Section 2.1093 of the FCC's Rules (47 CFR§2.1093).

The FCC also categorizes the use of the device as based upon the user's awareness and ability to exercise control over his or her exposure. The two categories defined are Occupational/ Controlled Exposure and General Population/Uncontrolled Exposure. These two categories are defined as follows:

- o **Occupational/Controlled Exposure:** In general, occupational/controlled exposure limits are applicable to situations in which persons are exposed as a consequence of their employment, who have been made fully aware of the potential for exposure and can exercise control over their exposure. This exposure category is also applicable when the exposure is of a transient nature due to incidental passage through a location where the exposure levels may be higher than the general population/uncontrolled limits, but the exposed person is fully aware of the potential for exposure and can exercise control over his or her exposure by leaving the area or by some other appropriate means. Awareness of the potential for RF exposure in a workplace or similar environment can be provided through specific training as part of a RF safety program. If appropriate, warning signs and labels can also be used to establish such awareness by providing prominent information on the risk of potential exposure and instructions on methods to minimize such exposure risks.
- o **General Population/Uncontrolled Exposure:** The general population / uncontrolled exposure limits are applicable to situations in which the general public may be exposed or in which persons who are exposed as a consequence of their employment may not be made fully aware of the potential for exposure or cannot exercise control over their exposure. Members of the general public would come under this category when exposure is not employment-related; for example, in the case of a wireless transmitter that exposes persons in its vicinity. Warning labels placed on low-power consumer devices such as cellular telephones are not considered sufficient to allow the device to be considered under the occupational/controlled category, and the general population/uncontrolled exposure limits apply to these devices.

The **Panasonic Toughbook Model: CF-19 FCC ID: ACJ9TGCF-19D** is evaluated to the Mobile Device requirements and is considered a device to be used by the General Population/Uncontrolled Exposure.

FCC ID: ACJ9TGCF-19D		MAXIMUM PERMISSIBLE EXPOSURE (MPE) DATA REPORT 	Reviewed by: Quality Manager
Test Report S/N: 0Y1003170441.ACJ	Test Dates: May 3, 2010	EUT Type: Toughbook Model: CF-19	Page 5 of 8

1.4 Procedure

The procedure used to determine the RF power density was based upon a calculation for determining compliance with the MPE requirements. The power generated by each transmitter used in this product was initially measured by a power meter and the powers were recorded. Through use of the Friis transmission formula, the power density level is calculated at a distance of 20cm.

The MPE was calculated for the device when an external antenna is used. The external antenna's gain which is to be used with the different available transmitters were used to calculate the MPE in all relevant bands of operation.

For the Cellular band, since GPRS source based time averaging is applicable, 2 slot GPRS represented the highest power. Since 2 slot GPRS, with conducted power within 0.1 dBm of 1 slot GPRS, has a duty cycle of 1/4, then $10 * \log(1/4) = -6.0$ dBm. Based on the Gobi2000 tune up procedure, max permitted output power for GPRS850 is 32.8 dBm. This + 1dB factory tolerance gives worse case of 33.8 dBm. 33.8 dBm + (-6.0 dBm) duty cycle factor is 27.8 dBm, which is used in the Cellular band MPE table below.

For the PCS band, CDMA2000 instead of time averaged 2 slot GPRS, represented the highest output power. Based on Gobi2000 tune up procedure, max power for CDMA2000 is 24.4 + 1dB factory tolerance = 25.4 dBm. This value is used for PCS band MPE table below.

In the Cellular band the highest permissible antenna gain is found by determining the highest EIRP value that makes the power density equal to the RF exposure limit. In the PCS band, the highest antenna gain is limited by the 2 Watt EIRP limit specified in Part 24.

Friis Transmission Formula

Friis transmission formula: $P_d = (P_{out} * G) / (4\pi r^2)$

Where,

P_d = Power Density (mW/cm²)

$p = 3.1416$

P_{out} = output power to antenna (mW)

r = distance between observation point and center of the radiator (cm)

G = gain of antenna in linear scale

Calculated MPE

The power density limit for General Population/Uncontrolled Exposure at each frequency is determined based on the information in Table 1-1.

External Antenna – 2.4GHz WLAN and Cellular/PCS:

Frequency	836.6 MHz
Limit	0.558 mW/cm ²
Distance (cm), R =	20 cm
Power (dBm), P =	27.8 dBm 602.56 mW
TX Ant Gain (dBi), G =	6.68 dBi
Power Density (S) =	0.558 mW/cm ² (at 20cm)
Minimum Distance =	20.0 cm

Table 1-2. Calculated MPE Data for Cellular Band – External Antenna

FCC ID: ACJ9TGCF-19D		MAXIMUM PERMISSIBLE EXPOSURE (MPE) DATA REPORT 	Reviewed by: Quality Manager
Test Report S/N: 0Y1003170441.ACJ	Test Dates: May 3, 2010	EUT Type: Toughbook Model: CF-19	Page 6 of 8

Frequency:	1880 MHz	
Limit:	1.000 mW/cm ²	
Distance (cm), R =	20 cm	
Power (dBm), P =	25.4 dBm	346.74 mW
TX Ant Gain (dB), G =	7.6 dBi	
Power Density (S) =	0.397 mW/cm ²	(at 20cm)
Minimum Distance =	12.6 cm	

Table 1-3. Calculated MPE Data for PCS Band – External Antenna

Frequency	2437 MHz	
Limit	1.000 mW/cm ²	
Distance (cm), R =	20 cm	
Power (dBm), P =	14.72 dBm	29.65 mW
TX Ant Gain (dB), G =	5 dBi	
Power Density (S) =	0.019 mW/cm ²	(at 20cm)
Minimum Distance =	2.7 cm	

Table 1-4. Calculated MPE Data for 2.4GHz Band – External Antenna

1.5 Summary of Results

Frequency Band [MHz]	Maximum Antenna Gain [dBi]	MPE @ 20cm (mW/cm ²)	Test Result
824.2 External Ant.	6.68	0.558	PASS
1880 External Ant.	7.60	0.397	PASS
2437 External Ant.	5	0.019	PASS

Table 1-5. Maximum Permissible Exposure Summary Table

FCC ID: ACJ9TGCF-19D		MAXIMUM PERMISSIBLE EXPOSURE (MPE) DATA REPORT		Reviewed by: Quality Manager
Test Report S/N: 0Y1003170441.ACJ	Test Dates: May 3, 2010	EUT Type: Toughbook Model: CF-19		Page 7 of 8

2.0 CONCLUSION

The device meets the mobile RF exposure limit at a 20cm separation distance as specified in §2.1091 of the FCC Rules and Regulations and Health Canada Safety Code 6. An appropriate RF exposure compliance statement will be placed in the user's manual.

FCC ID: ACJ9TGCF-19D		MAXIMUM PERMISSIBLE EXPOSURE (MPE) DATA REPORT 	Reviewed by: Quality Manager
Test Report S/N: 0Y1003170441.ACJ	Test Dates: May 3, 2010	EUT Type: Toughbook Model: CF-19	Page 8 of 8