

Matsushita Electric Corporation of America

Product Safety & Compliance Division

Panasonic Quasar Technics

1 Panasonic Way, 4B-8
Secaucus, NJ 07094
Fax: (201) 392-4564
e-mail: MullenR@panasonic.com

Richard Mullen
Group Manager
Tel: (201) 348-7758

January 25, 2001
PCPD-00-F004D
EA99423

Re: FCC ID: ACJ9TGCF-27GSM
Applicant: Matsushita Electric Industrial Co., Ltd.
Correspondence Ref No: Email dated 01/24/01 from Kwok Chan
731 Confirmation Number: EA99423
Type Product: FCC Part 24E / Licensed Portable Transmitter

Attn.: Kwok Chan and Errol Chang,

This is in response to your Kwok Chan email correspondence dated 01/24/01 regarding the subject matter. Please note our following answers and comments:

1. Panasonic Notebook Computer (Computer), Model CF-27 Series will be marketed with optional GSM PCS Module (GSM Module) installed within its enclosure and has a retractable antenna located at the top of the Computer display panel. Considering this products design and intended usage, the worst-case SAR test was performed with the Computer's antenna located 1.0 cm from the phantom body to represent portable and not mobile usage (i.e. used less than 20 cm from body). As such, this product should not be considered as worn on body.
2. This Computer is provided with external antenna connector intended for user provided vehicle-mounted antenna. The user is already advised in the addendum page for GSM Module that external antenna gain should not exceed 3 dBi gain, because we wanted to assure the overall maximum conducted output power would fall within scope of MPE categorical exclusive requirements. We believe the following wording should satisfy FCC's concern:

"To comply with FCC RF exposure safety requirements, maintain a minimum spacing of 1 cm (approximately ½") between Notebook Computer antenna and person's body during wireless modes of operation. External antenna gain should not exceed 3 dBi and should be installed by profession to assure proper installation and minimum spacing distance of 20 cm (approximately 8")."

Please confirm we do not have to include the following type additional wording as we feel the consumer would not understand meaning of MPE categorical exclusion: "Higher than 3 dBi antenna gain must not be used to ensure that this device qualifies for MPE categorical exclusive." For your quick reference, refer to attach copy of addendum page for GSM Module, which was previously filed.

3. The Computer is provided with PCMCIA Slot and this application does not include not yet available Wireless LAN Card or other possible wireless devices, which would be subject to separate SAR evaluation. When such wireless devices become available, they will be treated separately from this application. At this time, we do not feel it necessary to confuse the user with additional caution or warning statements regarding not yet available wireless devices in the User Manual.

4. This Computer is in compliance with FCC Part 15B under Declaration of Conformity rules and will use FCC logo; and the GSM Module in compliance with FCC Part 24E under Certification rules and will use TX FCC ID: ACJ9TGCF-27GSM. The combination DoC and FCC ID label appears on the bottom enclosure of the Computer. For your quick reference, refer to attach copy of combined DoC and FCC ID label, which was previously filed.

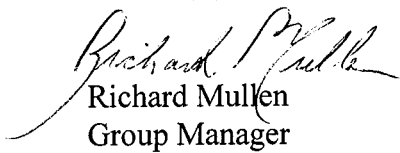
5. We agree that this GSM Module grant should contain note that its rated power output is 1.05 watts EIRP and agree to the following proposed grant conditions:

“Output is EIRP. Device operates with a GSM modular transmitter FCC ID: ACJ9TGCF-27GSM installed in a specific laptop/notebook computer, as described in this filing, operating with a retractable antenna located at the top of the computer display panel. The device has been tested for SAR compliance in typical laptop computer configurations. It may also operate with an external antenna, not exceeding 3 dBi gain, mounted on the exterior of a vehicle to provide a separation distance of 20 cm or more from persons to satisfy MPE categorical exclusion requirements of 2.1091. SAR compliance for other transmitters that may operate with this computer and transmitter must be addressed through separate filings. Users must be informed of the operating requirements for satisfy RF exposure compliance. The highest reported SAR value is 1.38 W/kg.”

To help expedite the subject application's final review, we request and authorize FCC to exchange this application with our other outstanding applications filed six (6) days sooner and which were issued Confirmation Numbers EA99376 or EA99377. It is critical for our marketing and sales commitment to get the final review and authorization before the end of this month to avoid possible major financial loss.

Should you have any questions or comments, please contact the undersigned. Thank you for your attention in this matter.

Sincerely yours,



Richard Mullen
Group Manager

Product Safety & Compliance Division

Addendum for Using GSM Model

This manual contains supplementary instructions regarding the use of the computer. It explains the cases where the operation of the computer differs from that in the OPERATING INSTRUCTIONS.

Read Me First - For U.S.A.

"OPERATING INSTRUCTIONS (page 3)"

Replace as follows.

Federal Communications Commission Radio Frequency Interference Statement

Note: This equipment has been tested and found to comply with the limits for a Class B digital device, pursuant to Part 15 of the FCC Rules. These limits are designed to provide reasonable protection against harmful interference in a residential installation. This equipment generates, uses and can radiate radio frequency energy and, if not installed and used in accordance with the instructions may cause harmful interference to radio communications. However, there is no guarantee that interference will not occur in a particular installation. If this equipment does cause harmful interference to radio or television reception, which can be determined by turning the equipment off and on, the user is encouraged to try to correct the interference by one or more of the following measures:

- Reorient or relocate the receiving antenna.
- Increase the separation between the equipment and receiver.
- Connect the equipment into an outlet on a circuit different from that to which the receiver is connected.
- Consult the Panasonic Service Center or an experienced radio/TV technician for help.

Warning

To assure continued compliance, use only shielded interface cables when connecting to a computer or peripheral. Also, any changes or modifications not expressly approved by the party responsible for compliance could void the user's authority to operate this equipment.

When used with the optional GSM PCS Module, a minimum spacing distance of 1 cm must be maintained between antenna and person's body during wireless modes of operation to comply with FCC RF exposure safety requirements.

This device complies with Part 15 of the FCC Rules. Operation is subject to the following two conditions:

- (1) This device may not cause harmful interference, and
- (2) This device must accept any interference received, including interference that may cause undesired operation.

Responsible Party: Matsushita Electric Corporation of America
One Panasonic Way
Secaucus, NJ 07094
Tel No: 1-800-LAPTOP-5 (1-800-527-8675)

FCC Regulation Notice for modem

This equipment contains a FCC approved modem.

Manufacturer of modem: Aztech Labs, Inc.
Model No. MP3930V-W



**Tested To Comply
With FCC Standards
FOR HOME OR OFFICE USE**

1. This equipment complies with Part 68 of the FCC rules. On the computer is a label that contains, among other information, the FCC registration number and ringer equivalence number (REN) for this equipment. If required, this information must be provided to the telephone company.
2. An FCC compliant modular plug is provided with this equipment. This equipment is designed to be connected to the telephone network or premises wiring using a compatible modular jack which is Part 68 compliant. See Installation Instructions for details.
3. The REN is used to determine the quantity of devices which may be connected to the telephone line. Excessive RENs on the telephone line may result in the devices not ringing in response to an incoming call. In most, but not all area, the sum of RENs should not exceed five (5.0). To be certain of the number of devices that may be connected to a line, as determined by the total RENs, contact the local telephone company.
4. If your telephone equipment cause harm to the telephone network, the telephone company will notify you in advance that temporary discontinuance of service may be required. But if advance notice isn't practical, the telephone company will notify the customer as soon as possible. Also, you will be advised of your right to file a complaint with the FCC if you believe it is necessary.
5. The telephone company may take changes in it's facilities, equipment, operations or procedures that could affect the operation of the equipment. If this happens the telephone company will provide advance notice in order for you to make necessary modifications to maintain uninterrupted service.
6. If trouble is experienced with this equipment, for repair or warranty information, please contact Matsushita Electric Corporation of America, toll free at 1-800-LAPTOP5 (1-800-527-8675). If the equipment is causing harm to the telephone network, the telephone company may request that you disconnect the equipment until the problem is resolved.
7. There are no user serviceable parts contained in this equipment.
8. This equipment may not be used on coin service provided by the telephone company. Connection to party lines is subject to state tariffs.
9. The Telephone Consumer Protection Act of 1991 makes it unlawful for any person to use a computer or other electronic device to send any message via a telephone fax machine unless such message clearly contains in a margin at the top or bottom of each transmitted page or on the first page of the transmission, the date and time it is sent and an identification of the business or other entry, or other individual sending the message and the telephone number of the sending machine or such business, other entity, or individual. In order to program this information into your fax software, you should refer to the manual of the Fax software being used.

"Caution : To reduce the risk of fire, use only No.26 AWG or larger telecommunication line cord."

"ATTENTION : Pour réduire le risque d'incendie, utiliser uniquement des conducteurs de télécommunications 26 AWG ou de section supérieure."

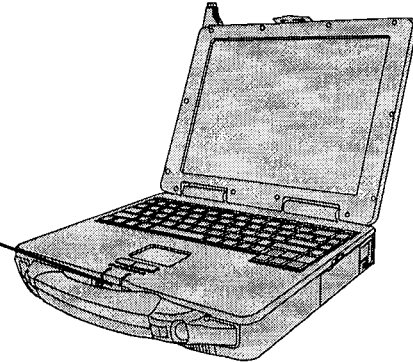
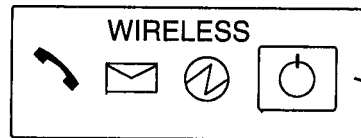
Using GSM

The following function has been added.

Your computer is equipped with GSM enabling you to communicate using radio frequencies.

Names and Functions

● Front Panel Description



GSM Switch

The modem powers up independently from the computer regardless of the computer power status and will remain on when the computer is power off.



Power On Indication - Green:

A green LED will be used to signal when the modem has been powered on.



Ring Indication - Amber:

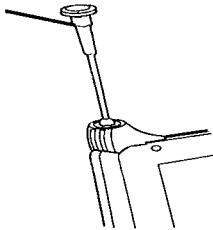
The LED will flash when the modem has received a ring.



Communication-mode Indication - Green:

The LED will light while communicating.

Antenna



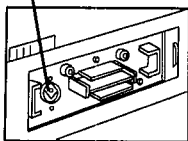
● H.O.T. Antenna

Your computer is equipped with a H.O.T. Antenna (High-gain, Omni-directional, Telescopic).

The antenna is retractable into the LCD assembly, and data can be sent and received even when the antenna is not extended.

Position the antenna to radiate away from the body to increase effective coverage.

External Antenna Connector



● External Antenna Connector

Your computer is equipped with an external antenna connector. An external antenna (i.e. mounted on a vehicle) may be connected to provide higher signal strength in fringe or low signal areas to maximize effective coverage.

CAUTION

- Do not apply excessive force to the H.O.T. antenna or external antenna connector. Doing so could weaken the signal reception strength or damage the antenna or computer.
- To comply with FCC RF exposure safety requirements, maintain a minimum spacing of 1 cm {approximately 1/2"} between Notebook Computer antenna and person's body during wireless modes of operation. Docking device (ex. Port Replicator) is provided with TNC antenna connector for user provided vehicle-mounted antenna to provide improved signal strength. External antenna gain should not exceed 3 dBi and should be installed by profession to assure proper installation and minimum spacing distance of 20 cm {approximately 8"}.

Printed in Japan

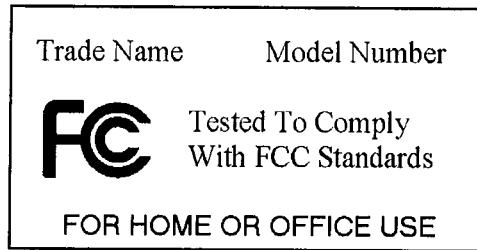
CD1200-1120 DFQX1380ZB



LABEL MARKING

**DoC FOR NOTEBOOK COMPUTER, MODEL CF-27 SERIES
FCC ID: ACJ9TGCF-27GSM FOR GSM PCS MODULE**

FCC Part 15B DoC label marking in accordance with Section 15.19(b)(1)(i) will be located on bottom enclosure of Notebook Computer and optional external FDD. Under DoC Rules, Section 15.19(a)(3) marking will appear in the User Manual.



FCC Part 24E FCC ID label marking in accordance with §2.926 for internal installed GSM PCS Module will be located on bottom enclosure of Notebook Computer.

Wavecom GSM Modem For Use With Panasonic Notebook Computer, Model CF-27

TX FCC ID: ACJ9TGCF-27GSM

When Notebook Computer is used with optional GSM PCS Module, a minimum spacing of 1 cm must be maintained between Notebook Computer mounted antenna and person's body during wireless modes of operation to comply with FCC RF exposure safety requirements.

FCC ID SAMPLE LABEL & LOCATION

(SEE NEXT PAGE)

LABELLING REQUIREMENTS **PER §§ 2.925**

The Label shown shall be permanently affixed at a conspicuous location on the device and be readily visible to the user at the time of purchase.

