

December 3, 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 / FCC Application Processing Branch
FCC ID: ACJ9TGCF-181A
Applicant: Matsushita Electric Industrial Co., Ltd.
CFN: 28073 and 28074
731 Confirm: EA205945 and EA726507
Type Product: Portable Notebook Computer Model CF-18 With Intel WLAN(a+b+g)

Dear Mr. Lyles,

Please note response to your two comments issued on November 22, 2004.

Portable Notebook Computer Model CF-18 Family (PC) 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 Port Replicator Model CF-VEB181 or Car Mounter Model NP-CF18.

The optional Port Replicator and Car Mounter 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 licensed radio service external antenna and must be professionally installed. Supplemental instructions will be provided for any employed licensed radio service and will provided external antenna recommended maximum antenna dBi gain.

FCC Comment 1: Please provide a photograph of the external mounter kit including cable.

Answer 1: Car Mounter is not provided with any external mounter kit. Instead, we recommend usage of Radiall/Larsen WLAN antenna, type MS3E2400TNC, which is provided with car roof mounting base and connection cable. Refer to today's separately filed external photographs of the Car Mounter and external WLAN antenna.

FCC Comment 2: User instruction language provided in your comment "LAN antenna cannot exceed 6 dBi ..." might be understood to mean that an installer can choose the antenna. The language should make it clear that the specific antenna provider with the "mounter" must be used. Please update the user instructions accordingly.

Answer 2: The basic CF-18 user manual gives general instructions and warning, while the separate supplement user manuals give exact additional details and warning for individual employed transmitters. The basic PC user manual gives the following type FCC RF exposure warning:

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FCC RF Exposure Warning:

- This equipment complies with FCC radiation exposure limits set forth for an uncontrolled environment.
- This equipment has been approved for portable operation, and unless otherwise advised in separate supplemental instructions for individual wireless transmitter(s), requires minimum 1.5 cm spacing be provided between antenna(s) and all person's body (excluding extremities of hands, wrist and feet) during wireless modes of operation.
- This equipment may use multiple installed transmitters, which may be capable of simultaneous transmission.
- This equipment may be provided with PC Card slot that could be used with wireless transmitters, which will be specifically recommended when they become available. Other third-party wireless transmitters have not been RF exposure evaluated for use with this computer and may not comply with FCC RF exposure requirements.
- This equipment may be provided with external antenna connector(s) for connection to optional Car Mounter or Port Replicator for mobile external mounted antenna(s). External antenna(s) must be professionally installed and cannot exceed recommended maximum antenna gain as described in individual provided supplement instructions for wireless transmitters. Also, user must maintain minimum 20 cm spacing between external antenna(s) and all person's body (excluding extremities of hands, wrist and feet) during wireless modes of operation.

Also, user manual page 10 under title "Names and Functions of Parts" for "External Antenna Connectors" will be amended to state:

- FCC RF Exposure Warning:

Optional Car Mounter and Port Replicator may contain 1 or 2 external TNC antenna connectors. One antenna connector is for connection of Radiall/Larsen WLAN antenna, type MS3E2400TNC with 3 dBi antenna gain. The other connector is for licensed radio service antenna and must be professionally installed; cannot exceed separately provided maximum recommended antenna dBi gain; and must maintain minimum 20 cm spacing between external antenna and all person's body during wireless mode of operation.

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