



American Telecommunications Certification Body Inc.
6731 Whittier Ave, McLean, VA 22101

May 24, 2005

RE: Acer, Inc.

FCC ID: HLZMS2161BG

I have a few comments on this Application. Depending on your responses, kindly understand there may be additional comments.

- 1.) Kindly review your Radiated Band Edge measurements. If you note your data in Section 4.5.3 of the 802.11b report, you will find a measurement of about +112dBuV feeding the antenna. Assuming a 2dBi antenna combined with the expected path loss of 11.7dB on a typical 3M site, I would expect to see a radiated value easily more than 100dBuV at 3 meters. Using your own plots of Section 4.5.6, we find a radiated value using a 1MHz RBW and a 3MHz RBW we have a peak radiated value of just 67dBuV. This makes me suspect that the EUT was not properly peaked for maximum emissions before performing this band edge test. Please review your restricted band edge data. An example calculation would also be useful.
- 2.) Is the SAR report required for evaluation of this device? The Manual seems to indicate that antennas for this product are more than 20cm away from the operator, and RF category "Mobile" rules would apply. Please review and advise.
- 3.) The Manual does not have any required SAR values to inform users of potential RF hazards. Please be sure the manual has these SAR values, assuming SAR testing applies. Otherwise simple 20cm restrictions should be on the Manual instead.
- 4.) The Manual also has a prohibition against co-location. How can this be true with the possibility of a Bluetooth transmitter operating at the same time as a WLAN?
- 5.) It is not clear from the SAR report that the Bluetooth transmitter was operating simultaneously with the WLAN. Please advise.
- 6.) The Manual claims this device "may or may not contain wireless radio devices (such as wireless LAN and/or Bluetooth modules)." Please be advised that this filing will refer to a product that has both WLAN and Bluetooth transmitters installed. Removal of either transmitter will invalidate this filing and this FCC ID.
- 7.) Schematics and Block Diagrams for the Bluetooth transmitter appear to be missing. Please review your Exhibits and advise.
- 8.) Label placement information (but not the actual label) is missing. Please advise. FYI: All references to the FCC ID of the Intel wireless card and the Bluetooth card must be removed from this device before installation.
- 9.) There are two identical copies of the 2200BG Wireless Card specification sheets (file names are different only) in the Operational Description, but no references to the Bluetooth transmitter. Please review your Exhibits.
- 10.) Kindly indicate the location of the Bluetooth antenna as well as the WLAN antennas in your SAR report.
- 11.) FYI: In the future, please upload all SAR reports to the RF Exposure exhibit. It will aid me greatly in moving about your application freely.
- 12.) Were both antennas evaluated during the SAR test? It is unclear exactly whether "Canary main" and/or "Canary aux" antennas were tested. Please provide more details.
- 13.) Were radiated Spurious Emissions tested with both the Bluetooth and WLAN transmitters operating simultaneously? FCC is now very interested in the potential interaction of multiple transmitters when operating in the same band due to the potential for intermodulation products. How was "worst case" determined for this test? Kindly review your findings.

A handwritten signature in black ink, appearing to read 'William H. Graff', with a stylized, cursive script.

William H. Graff
President and Director of Engineering

[mailto: whgraff@AmericanTCB.com](mailto:whgraff@AmericanTCB.com)

The items indicated above must be submitted before processing can continue on the above referenced application. Failure to provide the requested information may result in application termination. Correspondence should be considered part of the permanent submission and may be viewed from the Internet after a Grant of Equipment Authorization is issued.

Please do not respond to this correspondence using the email reply button. In order for your response to be processed expeditiously, you must submit your documents through the AmericanTCB.com website. Also, please note that partial responses increase processing time and should not be submitted.

Any questions about the content of this correspondence should be directed to the sender.