

May 24, 2005

RE: Acer, Inc.

FCC ID: HLZMS2161BG

Dear Bill,

Here are our answers,

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.

ANS: 67.7dBuV/m is the value of spectrum reading , 103.2 dBuV/m is the real value after added correction factor (Correction Factor=Antenna Factor + cable loss– amplifier gain). Please refer to data list in Section 4.5.6 for detail.

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.

ANS: It's a tablet PC, so it must need SAR test. I will try let you know in my cover letter next time. And, for 20cm, did you see it? I have already removed “20cm” wording in my first uploading.

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.

ANS: SAR's value was added on manual page 58

The maximum spatial peak SAR value for the sample device average over 1g was found to be 0.250W/Kg.

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?

ANS: Sorry, we have removed the words. See manual p58

5.) It is not clear from the SAR report that the Bluetooth transmitter was operating simultaneously with the WLAN. Please advise.

ANS: Please refer to page 6 of SAR report.

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.

ANS: I have removed the wording. See manual P57

7.) Schematics and Block Diagrams for the Bluetooth transmitter appear to be missing. Please review your Exhibits and advise.

ANS: I have got the Schematics and Block Diagrams for the Bluetooth, and uploaded.

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.

ANS: Label location was on the page 2 of file “Label and Location. Pdf ”. Please try to find it. For module’s label, I will forward your comment to my client to remind they removing it.

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.

ANS: I have got the specification for the Bluetooth, and uploaded

10.) Kindly indicate the location of the Bluetooth antenna as well as the WLAN antennas in your SAR report.

ANS: Please refer to page 5 of SAR report. The location of Bluetooth antenna is under touch pad of notebook.

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.

ANS: OK

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.

ANS: Please refer to page 6 of SAR report.

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.

ANS: Both of Bluetooth and WLAN have larger Peak Output Power at low channel, same as spurious emissions test. So, we determined “Bluetooth low channel” and “WLAN low channel” transmitters operating simultaneously was worst case in this case.

Note: According our information (conclusion of TCB Training Course May,11~13,2005), it doesn't care about Spurious Emissions for co-located transmitters except used the same antenna.

Please review and give your comments

Thank You

Daphne Liu

2005/06/09