



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

June 14, 2005

CONFIDENTIAL

RE: Acer, Inc.

FCC ID: HLZMS2161BG

These are my final comments on this filing. Much of my current concerns address how you wish to have the final product Certified and were not available until my earlier letters were addressed.

This filing uses one FCC ID to cover the entire product [FCC ID:HLZMS2161BG] which contains both an 802.11g transmitter and a Bluetooth transmitter. In your test report you refer to a second separately certified FCC ID [QDS-BRCM1009] for which you have supplied a separate Test Report and a Grant of Equipment Authorization. The problem is that this device was Certified as a "Modular Approval" only when co-located with one specific FCC ID.

All FCC filings must stand on their own merit. This means for this case that if HLZMS261BG should consist of both the Bluetooth transmitter and the 802.11g transmitter than your test reports must be modified to show one FCC ID only. This means that references to the original Bluetooth FCC ID is incorrect if for no other reason then the original filing was approved when co-located with only one specific transmitter.

There are two solutions I see available: (1.) remove all references to FCC ID:QDS-BRCM1009 and fold as much test data as possible from the CCS filing into your own test report, or (2.) apply a Class II PC for FCC ID: QDS-BRCM1009 to demonstrate compliance when co-located inside the HLZMS261BG product. This solution will require two FCC IDs on the bottom of this product. The first will be the label as currently provided. The second label will specify "Contains Inside FCC ID: QDS-BRCM1009".

Please advise at your earliest convenience. I intend to give this filing top priority over the coming days.

Best regards,

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.