



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

May 17, 2005

RE: Acer Inc.

FCC ID: HLZMS2161BG

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

- 1.) This device consists of a notebook computer with 802.11b/g WLAN card and a separately approved Bluetooth module FCC ID:QDS-BRCM1009. This makes for a little bit of a confusing filing, so let me give you a helping hand. According to your Form 731, you are only seeking approval for the notebook computer when the WLAN card is installed. Although test reports were provided for the BT module, this device was tested and Certified as a separate device with its own FCC ID. No test data was provided for the BT module in its current configuration inside the Travel Mate C310 computer. This means you have two choices: (a.) Allow the BT FCC ID to be displayed on the outside of the computer within the statement "Contains Inside FCC ID: QDS-BRCM1009" in addition to the labeling you have already submitted, or (b.) allow the existing labeling for FCC ID: HLZMS2161BG to refer to the entire notebook computer, complete with BT transmitter. The first case (a.) does not require a great deal of retesting, but will require a Class II PC to FCC ID: QDS-BRCM1009 when associated with the Travel Mate C310 and in a co-located situation with the Intel WLAN card. The second case (b.) will require full retesting of the BT transmitter where the FCC ID will refer to the entire notebook with co-located BT and WLAN. This option will produce two Grants under equipment codes DTS and DSS, but with just one ID. You will need to instruct me how you want me to go before I can continue my evaluation.
- 2.) The antennas for this device are located in both the upper lid lip and the left side lip of the display. Currently there are no standards for evaluation of SAR reports with antennas in this configuration. It does appear that the antennas may be 20cm from the end user's body (excluding hands and wrists) when used in a normal operating position. This means that a simple MPE evaluation and not a SAR report would be more appropriate for this device. I can accept the SAR report only upon condition that it is for "informational purposes only" and not to be used as a basis for my evaluation. If using the SAR report is necessary as a basis for Certification (instead of MPE estimation), then this filing must go to the FCC. Please advise.

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.