

American Telecommunications Certification Body Inc.

6731 Whittier Ave, McLean, VA 22101

March 12-13, 2008

RE: Nortel Networks

FCC ID: AB6NT2100V3231

After a review of the submitted information, I have a few comments on the above referenced Application. Depending on your responses, kindly understand there may be additional comments.

- For internal photos, generally the photographs should include the front/back of each board in the RF path and also the general internal construction of the device. A few additional photographs will still likely be necessary. Please review.
- 2) Labeling exhibit should also show placement of the label (i.e. "location") on the device.
- 3) Equipment code on Part III (4)(a) should be TNB. Please adjust. It appears the grantee code was inserted here.
- 4) While we understand that RF exposure may be handled by licensing for fixed outdoor use, there are some concerns for indoor given indoor suggestions in the operational description (see page 14). If so, Pico-base stations, Micro-base stations and other fixed-mounted transmitters operating with indoor antenna(s) typically are required to satisfy MPE Categorical Exclusion Limits established in §2.1091. This would require RF exposure evaluation (i.e. measurements not just calculations) are required by 2.1091 for > 1.5 GHz range if the ERP is > 3.0 Watts. Please review/explain, and provide any necessary information.
- 5) Factory Tune up procedure does not appear to be provided. Please provide. ? (2.1033(c)(9))
- 6) Most documentation mentions 79 Watts output (1 or multiple carriers). However operational description mentions 18 Watts. Please explain.
- 7) FYI....Some of the test report documents mention type acceptance. Please note that this is an old authorization by which licensed devices used to be approved. However, this is no longer true and is referred to simply as Certification.
- 8) Several spurious emissions plots do not appear to match the labels and also appear to use RBW < specified in the tables. Many appear to be bandedge measurements, but are labeled for much wider spans and use RBW < 1%. Please review/explain as necessary.

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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.