

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

May 2, 2003

RE: Nortel Networks, Inc.

FCC ID: AB6NT800MFRM2 Permissive Change

After a review of the submitted information, I have a few comments on the above referenced Application.

 The description of changes mentions that there have been changes made regarding clocks, the amplifier, and TX Lo, etc. However, it can not be adequately determined if these changes will be allowed under a permissive change. Please provide further justification to support the following below.

Please note that 2.1043 states the following regarding Permissive changes:

Changes to the basic frequency determining and stabilizing circuitry (including clock or data rates), frequency multiplication stages, basic modulator circuit or maximum power or field strength ratings shall not be performed without application for and authorization of a new grant of certification. Variations in electrical or mechanical construction, other than these indicated items, are permitted provided the variations either do not affect the characteristics required to be reported to the Commission or the variations are made in compliance with the other provisions of this section.

- 2) Please provide better photographs of the bottom of the PA board(s) without the "heat sink".
- 3) Please provide a clearer or higher resolution copy of the label. The characters must be easily distinguished.
- 4) Please explain all the N/A's given in table 42. and a few of the other N/A's seen for 8 PSK and QPSK modulations.
- 5) Table 56 appears to have an incorrect calculation for ppm at 50 degrees, please correct.
- 6) Please provide information regarding the emission designator that should be used for new modulations of QPSK, 8PSK, and 16QAM.
- 7) FYI. The references in the test report from Sanmina-SCI to 22.917(e) are incorrect. This section of the rules was changed since issuance of the New FCC Part 22 rules effective on Feb 18, 2003:

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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.