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To Whom It May Concern:

Due to management decision new modules called i-modules will be introduced in UMTS Outdoor and Indoor2 iBTS. These **i-modules will replace all standard modules** in Outdoor and Indoor2 iBTSs. Standard modules will no be sold anymore in the US. Specifically CCM, CEM and TRM Modules will be replaced by their second generation versions iCCM, iCEM and iTRM:

- iCCM logic only module it is based on a single PCB design, whereas the current CCM is a two PCBs design. iCCM board is packaged into a dual slot iCCM module which size is equivalent to current CCM (50 mm wide). The second slot of iCCM module will allow the easy integration of different types of future network extension boards.
- iCEM logic only module is identical to CEM in terms of form, fit and function with the exception of increased capacity and performance. The iCEM improves iBTS call processing capacity over CEM while offering enhanced capacity to handle future advanced features.
- iTRM logic and RF product is still based on two PCBs design (Radio and Digital PCB), package inside a single module. The iTRM is identical to the current TRM in terms of form, fit and function. On the receiver part, the RX demodulator uses direct demodulation and therefore the intermediate frequency stage of the TRM demodulator has been suppressed.

BTS maximum output power with i-modules **remains within the same margins** as standard modules having 45.55 dBm of nominal maximum output power with the same range of variation of  $\pm 0.6$  dB, leading to an absolute range of maximum output power from **44.95 dBm up to 46.15 dBm**.

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The reasons for these close-in-time certifications are the stringent client delivery dates and the penalties associated with them since i-modules were not ready for the first certification campaign. We would like to reuse the same labeling and thus the same FCC Identifier.

Therefore we kindly ask to consider a Class II permissive change for the introduction of i-modules on UMTS Indoor2 and Outdoor iBTS. Would you have any further questions, please call or send an e-mail to [lmoulin@nortelnetworks.com](mailto:lmoulin@nortelnetworks.com).

Best regards,

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