

Exhibit 12

Section 2.1033 (c)(13) DESCRIPTION OF THE DIGITAL MODULATION SYSTEM

For equipment employing digital modulation techniques, a detailed description of the modulation system to be used, including the response characteristics (frequency, phase and amplitude) of any filters provided, and a description of the modulating wavetrain, shall be submitted for the maximum rated conditions under which the equipment will be operated.

Response:

Digital modulation is controlled by the Lucent Technologies UMTS CDMA Radio 1900 (UCR1900), FCC ID: AS5ONEBTS-04, granted 24 September 2002. The UCR1900 provides the Quadrature Phase Shift Keying (QPSK) modulation required for CDMA signals.

EXHIBIT 13

Section 2.1033 (c)(10): Means for Frequency Stabilization

Response:

The P2PAM does not contain any frequency determining, frequency conversion or frequency stabilizing circuitry.

The frequency stabilization for the CDMA signal is provided by the Lucent Technologies UMTS CDMA Radio 1900 (UCR1900), FCC ID: AS5ONEBTS-04, granted 24 September 2002.