

25 April 2006

American TCB
6731 Whittier Avenue
McLean VA 22101

RE: ADC Telecommunications Inc
Response to April 12, 2006 Comments

FCC ID: F8I-DCX0801B
ATCB003371

In response to your comments on the above submittal from April 12, 2006.

1. ATCB Comments: Please note that the conducted output power listed on the 731 for CDMA is 7.69W. However, the report only supports a conducted power of 183mW (see page 20 of the test report). Please note that there is nothing in the report to suggest that measurement methods differ from the other power measurements. Please note however that the 16.23 dB suggested in the report (page 20) is not an average relationship but an apparent relationship between a resolution bandwidth of 30kHz of the analyzer and 1.25MHz OBW of the device. But, as mentioned, there is nothing in the report to suggest this resolution band width was used in actual measurements. Therefore, please note justification for the use of this correction factor does not exist in the report. In order to justify this value you must show the ratio of the resolution bandwidth of the analyzer as compared to the OBW of the device (i.e. $10\log(1250/30)$). Please provide full details on the analyzer settings used to make CDMA measurements in the report to support this 16.23 dB factor. Please also include a formula showing how you calculated this factor and how it applies to the data in the table.

RESPONSE: Test Report WC506388 has been revised to include explanation.

2. ATCB Comments: Please provide analyzer resolution bandwidths and analyzer video bandwidths for the various tests performed in the report.

RESPONSE: The RBW and VBW are indicated below each graph and in the text to the right of each graph. (As shown on page A7 of WC506388 Rev A.)

3. ATCB Comments: Please note that the statement mentioned in the MPE report as being in the manual cannot be found in the manual. While Rf exposure is addressed at the time of licensing, documentation still needs to be consistent. Please correct all documentation to state the same safe rf separation distances.

RESPONSE: The statement as indicated in the MPE letter has been added to pg ix of the manual (page 11 of 130).

The above referenced documents have been uploaded to the website at the same time as this response.

Please let us know if anything further is required.



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