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26 October 2005

American TCB 6731 Whittier Avenue McLean VA 22101

RE: ADC Telecommunications

Response to 10252005 Comments

FCC ID: F8I-DCX1902A

In response to your comments on the above submittal from October 25, 2005.

1.) The RF Pout listed on Form 731 does not match the maximum noted in either the Test Report or the RF Exposure evaluation. Please correct.

RESPONSE: Both the RF Exposure letter and Form 731 indicate 43.13 dBm (20.56 Watts). The Test Report shows 41.97 dBm (15.74 Watts). The reason the FCC report for EIRP (Effective Isotropic Radiated Power) states 41.97 is because the FCC tests the output power with a **single carrier** through the system in a "max input = max output" format. The number used in the RF Exposure letter and Form 731 was taken from the Industry Canada method, per RSS-131 Section 4.3 (noted below).

Set the two generator frequencies f1 and f2 such that they and their third-order intermodulation product frequencies, f3 = 2f1 - f2 and f4 = 2f2 - f1, are all within the passband of the DUT.

For enhancers rated 500 watts or less: Raise the input level to the DUT until the greater level of the intermodulation products at the enhancer output terminals, Po3 or Po4, equals -43 dBW.

Record all signal levels and their frequencies. Calculate the mean output power (Pmean) under this testing condition using Pmean = Po1 + 3 dB.

Pmean = +43.13 dBm or 20.56 Watts

2.) FYI: I await your photos, schematics and parts list.

RESPONSE: Photo, Schematic, and Parts List files have been uploaded.

3.) Please note that all Licensed radio transmitters must include a Tune Up procedure. If no user or field serviceable controls are available, then a description of how the equipment is adjusted in the factory is required. FCC is concerned with how RF power and frequency will be maintained and controlled. If desired, this Tune Up procedure can be held Confidential, but must be included on the Confidentiality Request letter

RESPONSE: Our apologies. This was overlooked on the initial upload. The Tune-Up Procedure information has now been uploaded.

Please let us know if further information is required.

Jolene 5 Murphy

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