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22 December 2005

American TCB 6731 Whittier Avenue McLean VA 22101

RE: ADC Telecommunications Inc

Response to December 22 2005 Comments

FCC ID: F8I-DCXSMR1A

In response to your comments on the above submittal.

1. Please note that there appears to be tape on the device in one of the external photos. This appears to be duct tape, but it is not clear if this is for the purpose of EMC compliance or not. Please explain.

**RESPONSE:** The tape was only a water ingress issue and nothing to do with EMC.

2. Please note that the emissions designators for this device as listed on the 731 are only D7W. However, the report also shows CDMA, which is F9W. If the CDMA is also desired to be on the grant, please revise the 731 form to include this emission designator.

**RESPONSE:** The Form 731 has been revised to list all of the modulations and emission designators. In addition, the Test Report has been revised replacing the EIRP test data (page 3) for all modulations.

3. Please note that the FCC ID number on the 731 does not match the FCC ID on the label and other information. Please correct the appropriate documentation so the FCC ID numbers are consistent.

**RESPONSE:** I apologize for my oversight. The ID had changed part way through the project and I apparently missed updating the Form 731. This has been corrected.

4. Please note that the documentation calls this device an antenna system. The 731 calls this device an amplifier and a CDX SMR system. This appears to be what the FCC refers to as a fiber optic distribution system, which is considered a signal booster or repeater. A booster retransmits signals on the same channel while repeaters retransmit on different channels. From the report this appears to be a booster. Please verify.

**RESPONSE:** The device is a repeater The form 731 has been revised to indicate frequency tolerance.

5. The manual says this device also has PCS frequencies. If this device operates in the part 24 PCS bands please explain and please provide the appropriate data.

**RESPONSE:** The top-level product that is sold to the customer to operate within the various frequency blocks pertaining to the systems respect approvals. Each system is approved specifically. In this case we approving the SMR 800/900 MHz System. A separate approval for the PCS 1900 MHz (1930-1965) was issued 11-2-05 (FCC ID F8I-DCX1902A). Each system is approved separately, though documentation has been combined for the ease of customer convenience. The following statement can be found on page 13 of the manual:

Each respective SMR, Cellular, and PCS system in this CXD platform is singularly FCC and IC approved. Information in this manual explains applicable portions of these systems.

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The above referenced documents, Form 731 and Test Report, 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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