



Washington Laboratories, Ltd.

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June 2, 2005

Mr. Dennis Ward
American Telecommunications Certification Body Inc.
6731 Whittier Ave
McLean, VA 22101

RE: Comments of June 1, 2005
APPLICATION: HDCTRC4202L1 Adtran, Inc.

Dear Mr. Ward:

Below are the comments that you have provided regarding the application for certification referenced above. Our responses to those comments are in ***bold italic***. Many responses refer you to additional exhibit(s) which has been uploaded to the application folder at the ATCB website.

Thank you for your attention. Please feel free to contact us for any additional information that you may require.

Regards,

Gregory M. Snyder
Chief EMC Engineer, Wireless/Telco Services Manager

Brian J. Dettling
Documentation Specialist

WLL Project: 8032

1) Please note that the Block Diagram is not listed on the request for confidentiality. This means that it will be for public view. If this exhibit is desired to be held confidential, please add it to the request for confidentiality.

R. The client has verified that confidentiality is not required for the Block Diagram.

2) FYI – no action needed. Please try to provide clearer and more focused internal photo exhibits.

R. Noted.

3) FYI – please note that on page 2 of the MPE report you refer to section 1.307 of the FCC rules.

Please note that the reference should be 1.1307.

R. Noted. The typo will be corrected for future reports.

4) Please note that while you refer to RSS210 in the report, you do not provide the relevant paragraphs from RSS210 that cross reference testing done. Please provide the RSS210 cross references needed.

R. The test report has been updated to add cross references to the RSS-210 standard. Please see exhibit "4202L1 Test Report Revised".

5) Please note that Industry Canada requires that a plot of the 99% Occupied Bandwidth be provided in the report. Please note that while a plot of the 6dB bandwidth for FCC is provided, I cannot find a plot in the report that shows a properly measured 99% bandwidth plot as defined and described in RSS210. Please provide this plot/data.

R. RSS-210 Issue 5, Amendment November 30, 2002 requires systems employing digital modulation techniques to comply with 6dB bandwidth requirement as stated below:

(iv) Systems employing digital modulation techniques (which includes direct sequence) can now be certified under RSS-210 provided they comply with the following requirements:

The minimum 6 dB bandwidth shall be at least 500 kHz.