



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

June 23, 2004

RE: Adtran, Inc.

FCC ID: HDCTRC4205L1

I have a few comments on this Application. Depending on your responses, kindly understand there may be additional comments.

- 1.) Page 15 of the Manual indicates antennas up to 44.2dBi gain can be used with this system. However, the RF Exposure evaluation shows just a 32dBi antenna. Please address this discrepancy throughout this filing.
- 2.) The channelization specified on Page 35 of the Manual does not match Form 731 or the Test Report. Please address.
- 3.) The Manual supplied does not contain any antenna installation instructions – specifically as to how RF exposure to bystanders shall be limited to the Uncontrolled Exposure limits or below. Please correct.
- 4.) All Part 15 intentional radiators must conform to the radiated limits of 15.209 and 15.205. Please explain how the Class A statement on page 5 of the Manual is acceptable.
- 5.) The emission bandwidth of the transmitted emission is over 20MHz wide but the spectral power bandwidth is shown on only a 300KHz span. Please prove that your 300KHz span is indeed on highest point of the emission.
- 6.) The Pout on Form 731 does not match the measured peak Pout in the test report.
- 7.) Please provide 15.205 radiated restricted band data using the highest gain antenna used with the system.
- 8.) The gain of the EUT antenna used during radiated emissions testing is not identified.
- 9.) A Block Diagram of the measurement setup used for the diode detector/signal generator substitution method Pout measurement would be helpful.
- 10.) Please review your Test Equipment chart (Table 9). What equipment was utilized for measurements above 20GHz?
- 11.) Please describe marketing plans so professional installation is assured.
- 12.) The operational description identifies two standards in Section 4.4. One is incorrect and the other is incomplete. Please review. FYI: There are multiple references to the UNII bands throughout this filing that must be removed since this is DTS equipment utilizing 15.247.

William H. Graff
President and Director of Engineering

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The items indicated above must be submitted before processing can continue on the above referenced application. Failure to provide the requested information may result in application termination. Correspondence should be considered part of the permanent submission and may be viewed from the Internet after a Grant of Equipment Authorization is issued.

Please do not respond to this correspondence using the email reply button. In order for your response to be processed expeditiously, you must submit your documents through the AmericanTCB.com website. Also, please note that partial responses increase processing time and should not be submitted.

Any questions about the content of this correspondence should be directed to the sender.