



Washington Laboratories, Ltd.

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October 11, 2002

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

RE: Comments of October 10, 2002
APPLICATION: FCC ID: HDCTRC4206 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: 7154

As you are processing the following response we would also like to request that the equipment code [Section III Block 4.(a)] on the **Form 731** be changed from **D S S** to **D T S**.

October 10, 2002
RE: Adtran, Inc.
FCC ID: HDCTRC4206

1) The label information does not state where the label will be placed on the device. Please provide a drawing or picture of where the label will be placed on the device.

R. Please see exhibit "4206 Label Location.pdf".

2) Please provide the MPE calculations for this device using the maximum antenna gain defined by the manufacturer.

R. Please see exhibit "4206 MPE Report.pdf".

3) Please note that the correct test method for DSSS devices according to the FCC is FCC97114. For antenna terminal conducted tests of Power out, this document states, "Power output. This is an RF conducted test. Use a direct connection between the antenna port of the transmitter and the spectrum analyzer, through suitable attenuation. Set the RBW > 6 dB bandwidth of the emission or use a peak power meter." You have used a signal substitution method. In light of the PPSD tests being performed using a direct connection through attenuation into a power meter, please explain why you have not used the prescribed recommended FCC test method for Peak Power Out of the device. Please note that the use of a CW signal into a power meter may not properly or adequately reflect the power from a DSSS QPSK modulated transmission.

R. The signal substitution method using the diode detector was chosen since the available spectrum analyzers did not have a measurement bandwidth greater than the 6 dB bandwidth (> 5 MHz).

4) Please note that the conducted emissions limits in Part 15 have changed since September 9, 2002. The frequency measured is now from 150kHz to 30MHz. If you are still using the older limits, you must attest to 15.37 Transition rules. Please acknowledge that you are aware of this rule change and are applying under 15.37 of the rules.

R. We are aware of the change to the conducted emissions test requirements and are filing this submission as permitted in accordance with the transition rules of Section 15.37(j).