



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

September 9, 2004

RE: Adtran, Inc.

FCC ID: HDCTRC4206L1

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

- 1.) Kindly carefully define all antennas which will be used with this device. Please include in your list antenna gain, type, and part numbers (if available).
- 2.) The Manual has what appears to be an incorrect reference to 15.407. Will this device be used under 15.247 or 15.407?
- 3.) The Manual claims this is a Class A digital device. This is only partially true. The digital circuitry associated with digital signal processing can indeed be Class A. However, any emissions that are directly associated with the transmitter must meet the limitations of 15.207 and 15.209. It is unclear if this requirement has been met. No radiated data has been presented below 1GHz. Please review.
- 4.) The FCC no longer recognizes ANSI C63.4-1992 as the preferred standard for radiated emissions testing. Kindly refer to current editions of this document.
- 5.) Section 4.5.1 does not identify the dish antenna used with this filing.
- 6.) The MPE estimation identifies the largest antenna as +44dBi. Please review with regard to item #1 (above) in mind.
- 7.) Many plots presented in the Test Report do not show any vertical divisions. It is therefore impossible to correlate to the limits. Please review.
- 8.) The Manual has conflicting information as to the actual frequency plan used for this product. Please help me understand the differences.
- 9.) Please provide plots for spectral power density.
- 10.) Is this product designated for professional installation? If so, how is it marketed?
- 11.) The schematics and theory of operation are listed for Confidential treatment. However, the operational description also contains the Block Diagram which is not listed as Confidential. Please either remove the Block Diagram from the Theory of Operations or add Block Diagram to the Confidentiality Request.
- 12.) Please remember that all references to safe MPE distances throughout this filing must match.

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.