Washington Laboratories, Ltd.

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December 6, 2005

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

RE: Comments of December 2, 2005
APPLICATION: HDCTRC6410 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: 8957

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1) Please note that the MPE states a maximum antenna gain of 21.1dBi. the test report states a maximum antenna gain of 21.1dBi. However, the manual mentions maximum antenna gains of up to 36dBi. Please note that any part 15 device must be tested with the highest antenna gain that is to be used with the device. If an antenna gain of 21.1dBi is the maximum antenna gain that is to be used with this device please remove the antenna gains that are higher than this from the tables in the manual (i.e. tables 1-5 showing antenna gains of 36dBi). Alternately, please test the highest gain antenna shown in tables listed in the manual.

R. The manual has been revised on page 20 to state that the antenna data is provided for information only and the device is approved to operate with dish antennas with a maximum gain of 21.1dBi. Please see exhibit "6410 User Manual rev1".

2) Please note that the report indicates a channel frequency at the low end of 2417MHz. However, the plot on page 13 of the report shows that the center frequency on of the lowest channel would be approximately 2420MHz and not 2417MHz. Please explain.

R. The center of the low channel is actually 2419MHz. Some of the plots in the original test report had the incorrect center frequency listed on the graph due to some preliminary documentation. These have been corrected and the test report has been revised. Please see exhibit "6410 Test Report Rev 1".

3) Please note that the maximum power into a 21dBi gain antenna used under point to point conditions would be 25dBm. Please note that the conducted power listed in the report for this device is 26.93dBm. It then appears that you have overdriven the 21.1dBi gain antenna in the radiated emissions data by almost 2dB. Please explain and please provided data using the appropriate power required by 15.247(b)(4)(i).

R. During the radiated emissions testing the radio was adjusted to an output power level of 25dBm so as not to exceed the 36dBm EIRP limit. This information has been added to the revised test report.