



Washington Laboratories, Ltd.

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January 31, 2006

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

RE: Comments of January 30, 2006
APPLICATION: HDCTRC6420L2 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: 9021-9022

1) Please note that the manual states the highest gain antenna for use with this device is 44.2dBi. However, the highest gain antenna which appears to have been tested is 42.5dBi. Please note that this means that only a maximum gain antenna of 42.5dBi can be used with this device. Please correct the manual to state the highest gain antenna tested. Alternately, please provide test data using an antenna of 44.3dBi gain.

R. The highest gain antenna tested was a 10 foot dish antenna. This has been accepted procedure for these units using large antennas. The data from the 2 foot dish antenna to the 10 foot dish show that there is no impact to the out-of-band emissions of the unit. Guidance from the FCC was provided for performing the testing of the large dish antennas, however, this letter was inadvertently left out of the test report. The FCC guidance letter has been uploaded.