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November 9, 2006

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

RE: Comments of October 17, 2006
APPLICATION: HDCTRC6420L2X Adtran, Inc.

Dear Mr. Johnson:

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: 9071-9072

1) The confidentiality letter mentions a parts list, although this wasn't provided. Please review.

R. The letter has been edited to remove the parts list. Please see "6420L2X Cover Letter - RFC revised".

2) According to recent FCC interpretations, the confidentiality letter must be signed by either the contact given on the FCC site for the applicant, or someone listed in the technical or non-technical portions of the 731 form (Washington Labs). Derek Foster does not appear to be listed on the FCC site as the appropriate contact (FCC site shows Jeff Whitmire). Please help correct the cover letters as necessary.

R. Please see revised letter.

3) Operational description mentions operation from 5464 – 5831 MHz. However this appears outside of the 15.247 band as well as the other information in the application only supports 5744 – 5831 MHz. Please review.

R. The Operational Description document has been corrected and now shows the correct frequency range of 5744 to 5831MHz. Please see “6420L2X Operational Description revised”.

4) Information from the FCC clearly mentions testing of a 10' or 12' dish. However test photographs appear to only support the testing of a 2' dish. Please review/provide.

R. Please see exhibit “6420L2X Test Setup Photos- Supplemental”.

5) Please provide a justification as specified in the FCC emails for only testing the 10' dish instead of the 12' dish.

R. The 10' dish antenna was used as the 12' dish antenna is a custom order piece and must be shipped in multiple pieces as it does not fit as one piece into a normal sized freight delivery. From a technical standpoint the data from the 2 (~21dBi) foot dish antenna to the 10 (~42.5dBi) foot dish show that there is no impact to the out-of-band emissions of the unit. All spurious emissions detected are not radiated through the antenna port but rather the enclosure of the unit.