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February 15, 2005

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

RE: Comments of February 5, 2005  
APPLICATION: LW9-CS458TXN / 2219B-CS458TXN

Dear Mr. Graff:

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: 8321/2

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- 1) Kindly note the Tune Up instructions use 9600bps (~4800Hz square wave?) and a deviation of 2.7KHz. This will affect several of your responses to my previous questions. First, Occupied Bandwidth should be provided using typical operating conditions and typical deviations. In this instance, Occupied BW should be provided using the modulating signal described in the Tune Up procedure. Second, whenever an analog transmission of data (typically F1D) occurs, the “classical” [2M + 2DK] method of determining Necessary Bandwidth is usually required. In general, using a “measured” methodology for determining necessary BW only applies to constant envelope RF emissions where changes in the data intelligence transmitted have no effect on the shape of the emission signature. Your explanation of using 3KHz at the highest deviation level is acceptable only if accompanied with an “Audio Response” plot showing the maximum deviation truly occurs a 3KHz. Please note that a deviation meter is highly suggested – “eyeballed” spectrum analysis is not appropriate. This means a change to the requested emission designator may be required. Please supply

new Occupied BW plots, a complete rationale for the requested emission designator [not just necessary bandwidth], and corrected application forms (if appropriate).

***R. New bandwidth plots have been obtained using 9600bps. Revision 2 of the test report also lists the calculations used for determining the necessary bandwidth and appropriate emissions designator. A modulation analyzer was used to measure the peak frequency deviation. The 731 Form has been amended for the new emission designator. Please see exhibits "CS458TXN Test Report FCC - IC Rev 2.pdf" and "CS458TXN Application Form - FCC Rev 2.pdf"***

2) Kindly confirm if Tune Up procedure does not need Confidentiality. If it does, then the Confidentiality Request letter will need to be updated.

***R. The Confidentiality Request letter has been updated to include the Tune-up Procedure. Please see exhibit "CS458TXN Cover Letter - RFC revised.pdf"***