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

November 24, 2004

RE: Miltel Communications Ltd.

FCC ID: MLLIWCRPT15-17

After a review of the submitted information, I have a few comments on the above referenced Application.

1) The internal photographs may not normally be held confidential strictly on the basis of trade secrets. Please remove this justification from the letter of confidentiality or provide a better justification. As an alternative, you may use a black marker to "black out" the top of any readable components and provide new internal photographs. Please let us know how you wish to proceed with this issue.
2) It is not clear how this behaves as a repeater. Is the information down converted? Does the TX rebroadcast any information it the 150-170 MHz band, or does it only re-broadcast information it is capable of de-modulating? Please provide further information for this mode of operation and clarify if this device is a booster or repeater. These are defined as follow:

   Booster is a device that automatically reradiates signals from base transmitters without channel translation, for the purpose of improving the reliability of existing service by increasing the signal strength in dead spots. An “in-building radiation system” is a signal booster. These devices are not intended to extend the size of coverage from the originating base station. A booster can be either single or multiple channels.

   Repeater is a device that retransmits the signals of other stations. Repeaters are different from boosters in that they can include frequency translation and can extend coverage beyond the design of the original base station. A repeater is typically single channel but can also be multiple channels.
3) If this is device considered a single channel (Class A) or multi channel (Class B) repeater/booster?

   Signal booster. A device at a fixed location which automatically receives, amplifies, and retransmits on a one-way or two-way basis, the signals received from base, fixed, mobile, and portable stations, with no change in frequency or authorized bandwidth. A signal booster may be either narrowband (Class A), in which case the booster amplifies only those discrete frequencies intended to be retransmitted, or broadband (Class B), in which case all signals within the passband of the signal booster filter are amplified.

   Depending on its classification, was the appropriate testing performed for intermodulation?
4) Please see attached guidelines for amps, repeaters, boosters. Please make sure all appropriate guidelines are followed.
5) In repeater mode of operation, please explain how the device performs power leveling. How does the output signal vary as a function of input signal level?
6) For purposes of testing, how does the device generate an output signal. If a input signal was required, how was a input level determined. Please provide further information (i.e. explain the alternative signal used).

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7) Normally for testing the emissions bandwidth of amplifiers, boosters, repeaters, the input signal is compared to the output signal. This does not appear to have been performed this way. Please explain.
8) Please provide information regarding the antennas used with the system.
9) Please provide RF exposure information for this device.
10) Please consider adding information to the users manual regarding licensing requirements. Examples of this are:

    The equipment user is required by the radio service rules to obtain a license before operating the equipment.

    Licensing of this equipment is the user's responsibility, and licensability depends on the user's classification and application, and on the selected frequency. The user is strongly urged to contact the appropriate telecommunications authority concerning proper licensing, and before choosing and ordering frequencies.

11) Please explain the reference level settings for plots 7.3.1 – 7.3.3 and 7.5.1 – 7.5.6. Is this the unmodulated output power. Normally a second unmodulated plot is also shown on the same plot to show the to equal the reference line level. If so, please explain why the reference levels between the 2 sets of plots do not match.
12) Please explain why the carrier is so low in plots 7.4.7 – 7.4.9. Was the antenna terminated for this test?
13) It is uncertain why the emission designator for this device is only 5K85F1D. It is assumed that it will rebroadcast emission received from FCC ID MLLIWCTX15-17 which has emission designator 12K5F1D.

Timothy R. Johnson
Examining Engineer

mailto: tjohnson@AmericanTCB.com

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.