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April 28, 2005

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

RE: Comments of April 27, 2005
APPLICATION: HDCTRC6320 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: 8650/1

1) Please note that page 6 of the manual states that “*The TRACER 6000 Series split systems ships with an integral low-gain antenna for some international applications.*” The device was tested with a model PL10F-23-N7A and a model SP2-5.8 parabolic dish antenna. However, gain in the documentation for the integral antenna does not match either of these two test antenna and the type antenna for the integral antenna is not mentioned. If all antennae are parabolic, then testing the highest gain antenna is sufficient. However, if the integral antenna mentioned in the manual is not of the type tested as listed, then data must be provided to allow this integral antenna as part of the filing. Please explain this antenna type and/or provide sufficient information and test data to allow its use.

R. The integral antenna is not part of this certification. The reference has been removed from the manual. Please see exhibit “6320 User Manual Rev 1.pdf”.

2) FYI – Please note that the MPE calculations were done using 89.1mW. However, the actual highest power measured was 95.5mW. The device MPE is still appropriate for the 4.6m separation listed, but the MPE report should provide correct data.

R. The MPE report has been revised to show calculations using the correct power. Please see exhibit “6320 RF Exposure Info Rev 1.pdf”.

3) Please note that your AC line conducted emissions are not correct. Please note that while this device as a digital device may only be limited to Class A conducted emissions, as an intentional radiator under part 15.247 it is restricted to those limits of 15.207. Please note that while you state 15.207 in the report you do not compare the AC conducted emissions to the correct 15.207 limits but to an erroneous 15.107 limit for class A digital devices. Please remember that there are not two sets of limits for class A or B under 15.207; there is only one set of limits. This limit compares to the Class B limits under 15.107. Please also note that when compared to the proper limits, this device appears that it may be failing. Please use the correct limits and rule parts for intentional radiator conducted emissions. Please retest and show proper compliance to the QP and AV limits as defined in 15.207.

R. The test report has been revised to show the new conducted emission measurements compared to the Class B limits of 15.207. Previous levels reported were peak measurements compared to the Class A average limit. The peak levels that exceeded or approached the average limit were re-measured and are now reported in the revised test report. Please see exhibit “6320 Test Report Rev 1.pdf”.