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August 22, 2006

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

RE: Comments of August 22, 2006
APPLICATION: HDCTRC6120L2X 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: 9258-9259

1) We are unsure about your comment regarding the 731 form citing the correct frequency range of 2419- 2465 MHz. Please note:

R. A correct Form 731 has been uploaded. We apologize for the discrepancy.

2) Regarding professional installation, please note that our intent is not to be burdensome, but this requirement does require adequate justification. It has been found that the simplest and most effective way to address this is through a cover letter specifically addressing the issue (note that it is also the best way to explain to many foreign applicants who commonly misunderstand the requirements). Additionally, in years past this is how the FCC has requested it. However if the information can be found other ways, it is acceptable.

Note that we have seen where some manufacturers simply attempt to cite professional installation in the manual in attempt to meet the requirements. However note that simply placing this fact in the manual is not necessarily sufficient to the FCC. For instance, please note the FCC's policy of marketing.

In this particular case, we do recognize that due to the design of the device both the installation and use (2 of the 3 items cited above) can be derived from the manual – and simply pointing to this fact in a response can be found as sufficient in some cases. Note however the manual itself can not adequately address the marketing aspect. We have found some manufacturers who simply cite professional installation in the manual but do not have any control of marketing – for example investigation finds that simply anyone with a credit card can purchase the device directly off the internet. Therefore investigations have led to insufficient professional installation premises in some cases. For this device simply provide an explanation on how the marketing aspect of the requirement is met.

R. The client refers us to the corporate website, which indicates obtaining their equipment is ONLY through their authorized dealer network. The devices are not available through outside vendors. Please reference:

http://www.adtran.com/adtranpx/Rooms/DisplayPages/LayoutInitial_webrQS_Q29udGFpbmVyPWNvbS53ZWJyaWRnZS5lbnRpdHkuRW50aXR5W09JRftENkFDQjE0RDgxOTc3RjQyODMwOTA1RDcyNkQ5NDdDMF1d

3) FYI....We understand your concern regarding manual information. In some cases please note that an amount of latitude can be given as given for many portions of your previous response. However it must be noted that while the manual may have been used before, each application must stand on its own. If through a particular review it is discovered something is missing or incorrect for a particular application, it should be corrected moving forward.

R. Acknowledged.

4) FYI....We are still awaiting a sample label per your email to address the IC labeling requirements.

R. A corrected IC form has been uploaded. The model listed on the form should match that shown on the label.