



October 29, 2006

Attn: Mr. Timothy Johnson

RE: ADC Telecommunications Inc.
FCC ID: F8I-DIS190AB

1) Application appears to only be submitted for GSM, TDMA and CDMA. However marketing information also suggests EDGE. Note that the FCC considers this different modulations (G7W for Edge) and tests such as power and single carrier conducted spurious should be performed for each modulation type. Please review the attached procedures.

ADC - New EDGE test data has been added to the FCC and IC report. New reports submitted. New 731 page submitted with EDGE included.

2) Output power within the 731 and the application shows 262 mW (24.2 dBm) for CDMA, but the manual page 26 and advertising literature appears to suggest an output power of 16.5 dBm. This appears to be a large unexpected difference. Please explain.

ADC – The test data that was originally submitted did not take into account the amount of peak to average rating sufficient enough for CDMA modulation. In order not to clip the signal, the input needed to be reduced to produce a quality signal. The new data shows sufficient signal levels to sustain a quality CDMA signal at a reduced output power.

3) RF exposure information mentioned in the RF exposure exhibit could not be found in the users manual. Please explain where this may be found or provide updated exhibits.

ADC – Page where reference is noted, is included. Attached - "Pages from Instruction Manual"

4) The application does not appear to contain information regarding both DC voltages AND currents applied into the several elements of the final radio frequency amplifying device for normal operation over the power range been provided? (2.1033(c)(8)).

ADC – New Frequency Tolerance test data supplied with the included testing of the frequency range of the Remote Unit. Additional note added to the report for the power supply utilized in the Remote. Also, the information was and is listed on the Conducted Emission Limits cover page for the Remote Unit.

Digital Remote Unit (DRU):
Range: 34-48 VDC
Tested @: 48 VDC
Tested @: 350 mA

5) FYI....In the future, please do not label RF exposure exhibits with SAR in the file name unless SAR is actually performed. The FCC has commented to TCB's on this fact before.

ADC – Noted.



6) Proposed Grant Comments (FYI):

Power output is conducted for a single carrier. The antenna installation and operating configurations of this transmitter, including antenna gain and cable loss must satisfy MPE categorical Exclusion Requirements of §2.1091. The antenna(s) used for this transmitter must be installed to provide a separation distance of at least 20 cm from all persons and must not be co-located or operating in conjunction with any other antenna or transmitter. Users and installers must be provided with antenna installation instructions and transmitter operating conditions for satisfying RF exposure compliance.

ADC – Noted.

For IC:

7) For IC labeling, the device appears to be covering a model GHVIH3110000000000. However according to labeling information, this appears to be the host unit and not the remote TX part of the system. However the device being certified is the remote unit. Therefore this model should not require Certification. Please review.

ADC – Correct, just the remote portion is being certified. Attached is a new “FCC-IC ID Label Drawing” with the Host information removed. The Host is ancillary.

8) If relevant, This application appears to be for multiple models under an existing family approval. Therefore, please include a list of all models to be included in the family and sufficient information to show that each of the devices can be approved under one Certification Number.

ADC – Only this Remote unit is approved for this Certification Number.

9) Maximum gain of antenna appears incorrect on the IC form. Other information suggests this should be dBd.

ADC – dBi has been switched to dBd. New EDGE data has been added.