TÜV America Inc.
1775 Old Highway 8 NW
Suite 104
New Brighton, MN 55112

Phone: (651) 631-2487
Fax: (651) 638-0285
E-mail: info@tuvam.com
www.TUVamerica.com

30 November 2006

American TCB
6731 Whittier Avenue
McLean VA 22101

RE: ADC Telecommunications Inc
Response to 20 October 2006 Comments

FCC ID: F8I-DSC0802P_ATCB004156
IC ID: 1208G-DSC0802P

In response to your comments on the above submittal from 20 October 2006.

1. **ATCB Comments**: Please note that for purposes of the FCC this type device is not classified as equipment code AMP, but would be either TNB or PCB. Please correct the 731 form to show the proper equipment code. Please see the FCC guidance document for amplifiers, boosters and repeaters for clarification.

   TÜV RESPONSE: The Form 731 has been revised accordingly and uploaded. (The IC RSP-100 has also been revised and uploaded.)

2. **ATCB Comments**: Please note that the brochure states the device "Supports 800 cellular, 800 SMR, 900 SMR, and 1900 PCS." Please note that the 731 only addresses PCS and Cell operation. Please provide appropriate test data for all appropriate rule parts. Alternately, please correct the documentation to show how this device is used with only PCS and Cell operation.

   ADC RESPONSE: The brochure is general information for this product family, which includes the frequencies listed above. This particular approval is only for the Cellular and PCS bands and respective rule parts. The 731 Form only notes this information. All other documentation states information applicable to all portions of these systems. The manual states "Each respective SMR, Cellular, and PCS system in the SCS platform is FCC and IC approved. Information in this manual explains applicable portions of these systems."

3. **ATCB Comments**: Please note that the brochure sates the device is capable of "modulation standards; e.g., iDEN®, GSM, CDMA, W-CDMA, IxEV-DO." Please provide test data showing inputs to the device for all modulation types used.

   ADC RESPONSE: This product is capable of transporting any type of modulation. In this specific approval, only Cellular and PCS frequencies are being approved so modulations like iDEN are not covered for these frequency bands.

4. **ATCB Comments**: Please note that on pages 22, 23 and 24 of the part 1 test report most of the frequencies used for power measurements are at or on the band edge. Please note that this would make the device automatically non-compliant with the associated rule parts as band edge data would exceed the -13dBm requirement (i.e. the peak of the signal is the band edge thus not compliant to parts 22 or 24). Please test the device using the correct signals specific to the rule parts for which the device is being certified. Please explain how the device filters prevent non compliance at the band edges.

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ADC/TÜV RESPONSE: New test data has been taken and added to the report. The spurious limitation is completed with the duplexer. The duplexer suppresses out-of-band spurious. Internal to the electronics, the use of SAW filters provides for higher Q roll-off at band edges. Additionally, the customer's/licensee's are licensed only to operate within their frequency allocation, thus federal regulation of the licensee would not allow non-compliance. The revised test report has been uploaded.

5. **ATCB Comments**: Please note that temperature and voltage stability data shown in part 1 test report (starting on page 25) are taken at frequencies on the band edges. Please note that automatically means the device is non compliant. Please provide frequency stability data where the device properly operates within the allowed band and not on the band edge.

   TÜV RESPONSE: The test report has been revised and uploaded.

6. **ATCB Comments**: Please provide Occupied Bandwidth data for all modulation types used in the device (i.e. the brochure states 1xEV-Do as well as WCDMA, yet neither appear to have been tested.).

   TÜV RESPONSE: The test report has been revised and uploaded.

7. **ATCB Comments**: Please note that band edge data fails parts 22 and 24. Please note that the limit at the band edges is -13dBm. Please also note that the fundamentals used to measure band edge compliance are also frequencies at the band edge. Thus all band edge data taken under this condition fail rule parts 22.917 and 24.238. Please retest using appropriate frequencies for the specific rule parts under consideration. Please explain how the device filters prevent non compliance at the band edges.

   ADC/TÜV RESPONSE: New test data has been taken and added to the report. The spurious limitation is completed with the duplexer. The duplexer suppresses out-of-band spurious. Internal to the electronics, the use of SAW filters provides for higher Q roll-off at band edges. Additionally, the customer's/licensee's are licensed only to operate within their frequency allocation, thus federal regulation would not allow non-compliance. The revised test report has been uploaded.

8. **ATCB Comments**: Please note that based on the responses to the above comments, a further complete review of documentation provided may be necessary.

   RESPONSE: Understood.

In addition, revisions (band edge testing) have been made to the Industry Canada Test Report WC505743.1, which has also been uploaded to the ATCB website. Please let us know if anything further is required.

Jolene S Murphy

Jolene Murphy, Senior Technical Writer
TÜV America Inc
Tel: 651 638 0271 / Fax: 651 638 0285
jmurphy@tuvam.com