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June 24, 2003

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

RE: Comments of June 6, 2003
APPLICATION: DYYNGT-2 Codan Limited

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: 7314

June 6, 2003
RE: Codan Limited
FCC ID: DYYNGT-2

1) Please note that while I may make assumptions as to how and where you derived the 84.4dBuV limit for 1.65MHz fundamental spurious emissions, the report needs to clearly identify the derivation and calculation of this limit.

R. The test report has been amended in Section 4.5 to show the calculation to arrive at the 84.4 dBuV/m limit. Please see exhibit "NGT-2 Test Report Revision 1.pdf."

2) Please note that the power output listed in the report for the range between 1.6MHz and 25MHz is 108watts. The power output listed for the 25 to 30MHz range is 117.5watts. Please note that the power on the grant for licensed devices is to be the measured power not the rated power. The 731 states the rated power. Please provide a 731 showing the frequency split in the range 1.6 to 25MHz and 25 MHz to 30 MHz (frequency tolerances are different in these ranges), and please provide a 731 with the measured power levels.

R. The 731 has been corrected to show the measured powers and the split frequency ranges. Please see exhibit "NGT-2 Form 731 Revised.pdf."

3) Please note that you have not justified the emissions designators. This can be done by calculation or sometimes by OBW measurements. Since you have not provided the calculation of the emissions designators, evidence in OBW plots showing justification for the three emissions designators listed on the 731 needs to be provided. I might be able to accept the J3E and H3E on the existing plot (difference being H is with full carrier and J is suppressed carrier), but I do not think this is justification enough for the J2B (SSB with quantized digital info) Please provide evidence of the emissions designators. Alternately, please explain why the existing plot should be used for all three.

R. Measurements of OBW have been performed using the SELCALL 2 tone FSK function of the radio to show the J2B emission designator. Plots have been added to the revised test report in Section 4.3. Please see exhibit "NGT-2 Test Report Revision 1.pdf."