

Exhibit 12: Operational Description**§ 15.203 Antenna Requirements**

The MCW-BASE4 (four antenna) uses a printed antenna that connects to the main board using special connectors. The same type as specified by the manufacturer can only replace these antennas; therefore, it meets the requirements of this section.

§ 15.307 Coordination with fixed microwave service

Enclosed on the following page is the UTAM affidavit stating compliance to this section.

UTAM Affidavit



Communication Certification Laboratory

June 7, 1999

Comdial Corporation
Mr. John Green
1180 Seminole Trail
Charlottesville, VA 22906

Dear John:

On behalf of UTAM, Inc., Communication Certification Laboratory, has certified that the equipment identified below, meets the disablement and location verification process (LVP) requirements of FCC Rule 15.307, and qualifies as a UTAM approved coordinatable device.

Applicant: Comdial
UTAM Member Number: COMDIAL1
UTAM Certification ID: CVWCCLUM00025
Fixed: CVW-AIMP-002B

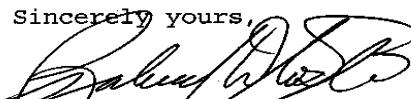
Model number(s):
System: DXW-M01 & FXW-M01
Fixed: MCW-BASE4 & MCW-BASE4-OD

Any changes to the (LVP) or disablement mechanism and procedure or any changes to the FCC Certification may require recertification by UTAM, Inc. Please document and forward the details of any changes to Communication Certification Laboratory.

Communication Certification Laboratory will continue to maintain strict confidentiality regarding the engineering and functionality of your product, including the disablement and location verification mechanism.

A copy of this affidavit shall be included with your application for certification by the FCC, in accordance with FCC Part 15, Subpart D.

Sincerely yours,



Richard D. Foster
Certifying Engineer
UTAM Certification Laboratory