

Exhibit 13: Cover Letters

June 29, 1999

FEDERAL COMMUNICATIONS COMMISSION
Equipment Authorization Division
7435 Oakland Mills Road
Columbia, MD 21046

To Whom It May Concern:

Enclosed is a FCC Part 15, Subpart D, Change in
Identification of Equipment application for the Comdial
Corporation Models MCW-BASE4 and MCW-BASE4-OD FCC ID: CVW-AIMP-
002B.

Please let me know if I can be of further assistance.

Sincerely yours,

COMMUNICATION CERTIFICATION LABORATORY

Joseph W. Jackson
V.P. Marketing