

August 24, 2006

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**Via Hand Delivery**

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12th Street, S.W.  
Washington, D.C. 20554

Federal Communications Commission  
Office of Secretary

**Re: AT&T Corp.  
Request for Experimental Special Temporary Authority ("STA")  
File No. 0598-EX-ST-2006**

Dear Ms. Dortch:

XM Radio Inc. ("XM") hereby comments on the above-referenced application of AT&T Corp. (AT&T), filed on August 17, 2006, requesting Experimental Special Temporary Authority ("STA") to perform propagation testing in the 2305-2390 MHz band. Due to the need to prevent potential harmful interference to XM's operations, XM requests that the Commission limit any grant of the STA to operations outside of XM's licensed frequency band (2332.5-2345 MHz) and require AT&T to adhere to existing Part 27 limits

XM is the licensee of a Satellite Digital Audio Radio System ("SDARS") system in the 2332.5-2345 MHz band that provides over 170 channels of high-quality, continuous, multi-channel audio service throughout the United States. Over seven million customers currently subscribe to XM's service.

The STA requests permission to perform propagation testing throughout the 2305-2390 MHz band, including within XM's licensed frequency band, in unspecified locations in Georgia and New Jersey. XM is concerned that AT&T operations under the STA using XM's licensed frequency band will result in harmful interference to XM's subscribers. AT&T's application does not address this issue. Accordingly, XM requests that if the Office of Engineering and Technology ("OET") grants the STA, OET requires AT&T to operate outside of XM's licensed frequency band (2332.5-2345 MHz).

XM also urges OET to require that any test equipment deployed in the 2305-2320 and 2345-2360 MHz bands must satisfy the out-of-band emission limits and other technical requirements for operations in this band as specified in Part 27 of the Commission's Rules. Compliance with these technical restrictions is critical to avoiding harmful interference to XM's

Ms. Marlene H. Dortch  
August 24, 2006  
Page 2

subscribers. To the extent the STA authorizes AT&T to operate in the 2320-2332.5 MHz band, which is licensed to another SDARS licensee, OET should also require any test equipment to satisfy the out-of-band emission limits and other technical requirements for operations in the 2.3 GHz band, as specified in Part 27 of the Commission's rules.

If there are any questions regarding this matter, please contact the undersigned.

Very truly yours,

A handwritten signature in black ink, appearing to read 'James Blitz', with a long horizontal flourish extending to the right.

James Blitz  
Vice President, Regulatory Counsel

cc: James Burtle, FCC  
John Kennedy, FCC  
Doug Young, FCC  
James J.R. Talbot, AT&T