

## **XM SATELLITE RADIO**

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July 14, 2008

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

**Re: Nortel Networks, Inc.  
Request for Experimental License  
File No. 0305-EX-PL-2008**

Dear Ms. Dortch:

XM Radio Inc. ("XM") hereby comments on the above-referenced application of Nortel Networks, Inc. ("Nortel") requesting an Experimental License to conduct testing in the 2.3 GHz band in Dallas, Texas for thirty-six months. Due to the need to prevent potential harmful interference to XM's operations, XM requests that the Office of Engineering and Technology ("OET") require Nortel to adhere to existing Part 27 limits for these experimental operations.

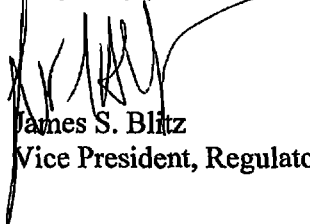
XM is the licensee of a Satellite Digital Audio Radio System ("SDARS") system in the 2332.5-2345 MHz band that provides over 170 channels of high-quality, continuous, multi-channel audio service throughout the United States. More than nine million customers currently subscribe to XM's service.

XM urges OET to require that any equipment operated in the 2.3 GHz band pursuant to this application must satisfy the out-of-band emission limits and other technical requirements for operations in the 2.3 GHz Wireless Communications Service 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 subscribers. In addition, XM requests that OET require Nortel to provide a 24-hour contact number so that any interference that does occur can be immediately resolved.

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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 S. Blitz', with a long horizontal flourish extending to the right.

James S. Blitz  
Vice President, Regulatory Counsel

cc: James Burtle, FCC  
John Kennedy, FCC  
Doug Young, FCC  
Tariq Habibullah, Nortel Networks, Inc. (htariq@nortel.com)