

August 21, 2007

Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12th Street, NW  
Washington, DC 20554

Re: *Application of Sirius Satellite Radio Inc. for Experimental Authorization --  
File No. 0357-EX-PL-2007*

Dear Ms. Dortch:

I am writing on behalf of the WCS Coalition in opposition to grant of the above-referenced application by Sirius Satellite Radio Inc. ("Sirius") for an experimental authorization that would permit it to deploy up to ten Digital Audio Radio Service ("DARS") terrestrial repeaters at unspecified locations within an area of more than 20,000 square kilometers surrounding Las Vegas, NV.

The membership of the WCS Coalition includes subsidiaries of NextWave Broadband Inc. ("NextWave") and AT&T Inc. ("AT&T") that hold licenses for the WCS spectrum in the area where Sirius proposes to conduct its experimental activities. Indeed, AT&T is currently providing a fixed wireless broadband service to paying subscribers in and around Pahrump, NV, and the service area for that offering extends into the area where Sirius proposes to experiment. Yet, Sirius's experimental application provides no discussion whatsoever of how Sirius will protect AT&T's current operations, much less any new deployments by NextWave or AT&T, from harmful interference due to overload or out-of-band emissions. To the contrary, the instant application provides no information at all regarding these potential sources of interference to Sirius' WCS neighbors, save for a vague comment that Sirius will be experimenting regarding "suppressing out-of-band emissions." Sirius does not even specify the out-of-band emissions to which its WCS neighbors will be subjected. While Sirius purports to recognize that its proposed repeaters "must not cause harmful interference to authorized facilities," its failure to identify the location at which its repeaters will be installed,<sup>1</sup> or to specify the out-of-band emissions WCS

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<sup>1</sup> It is unclear why Sirius cannot specify the locations at which it proposes to operate under its experimental authorization. Although its filing is not clear, it appears that the purpose of the experimental authorization is "to test its repeater technology beyond the factory but before deployment in the field [to] allow Sirius to more efficiently ensure that those repeaters will operate correctly once installed." See Application at 2. Sirius does not explain why

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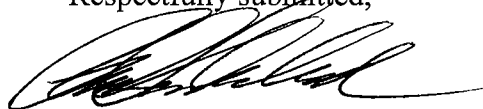
August 21, 2007

Page 2

operations will face, makes it impossible for WCS licensees or the Commission to take comfort that there will be no interference from Sirius' experimental activities. Sirius must do more to assure that wireless broadband subscribers do not suffer interference while Sirius experiments.

For these reasons, the WCS Coalition urges the Commission to deny the above-referenced application.

Respectfully submitted,



Paul J. Sinderbrand

Counsel to the WCS Coalition

cc: Patrick L. Donnelly

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it cannot today identify where those activities will occur, which would assist NextWave and AT&T in assuring that possible interference from overload and out-of-band emissions is avoided before WCS subscribers suffer.