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March 6, 2007

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Federal Communications Commission
Office of the Secretary

VIA HAND DELIVERY

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

**RE: Requests for Experimental Special Temporary Authority ("STA")
Alcatel-Lucent, File No. 0135-EX-ST-2007**

Dear Ms. Dortch:

XM Radio Inc. ("XM") hereby comments on the above-referenced application of Alcatel-Lucent requesting Experimental Special Temporary Authority ("STA") to demonstrate WiMAX technology in the 2300-2310 MHz and 2350-2360 MHz bands at the CTIA tradeshow to be held in Orlando, Florida from March 26 through March 29, 2007. Due to the need to prevent potential harmful interference to XM's operations, XM requests that the Office of Engineering and Technology ("OET") require Alcatel-Lucent to adhere to existing Part 27 limits for these experimental operations.

XM is the licensee of a Satellite Digital Audio Radio 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 7.7 million customers currently subscribe to XM's service.

XM urges OET to require any equipment operated in the 2.3 GHz band pursuant to this STA to 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.

Ms. Marlene H. Dortch

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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 Burtles, FCC
John Kennedy, FCC
Doug Young, FCC
Joseph Demottie (demottie@alcatel-lucent.com)