

SIRIUS XM

RADIO INC.

ORIGINAL

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May 15, 2009

FILED/ACCEPTED
MAY 15 2009
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: Cisco Systems
Request for Experimental STA
File No. 0198-EX-ST-2009

Dear Ms. Dortch:

Sirius XM Radio Inc. ("Sirius XM") hereby comments on the above-referenced application of Cisco Systems ("Cisco") requesting an Experimental Special Temporary Authority ("STA") to conduct testing in the 2.3 GHz band to test Wi-Max and cellular products in the vicinity of Cisco campuses at Research Triangle Park, NC; San Jose, CA; Plano, TX; Collin, TX; and Richfield, OH. Due to the need to prevent potential harmful interference to Sirius XM's operations, Sirius XM requests that the Office of Engineering and Technology ("OET") require Cisco to adhere to existing Part 27 limits for these experimental operations.¹

Sirius XM is the licensee of Satellite Digital Audio Radio System ("SDARS") systems in the 2320-2332.5 MHz and 2332.5-2345 MHz bands that provide a high-quality, continuous, multi-channel audio service throughout the United States. More than nineteen million customers currently subscribe to the Sirius XM service.

Cisco's application proposes to conduct testing in the bands 2310-2320 MHz and 2345-2360 MHz bands, which are directly adjacent to Sirius XM's licensed bands. Sirius 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

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On May 12, 2009, the Commission granted Cisco's application, Call Sign WD9XCP. Sirius XM's concerns remain valid notwithstanding this grant.

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interference to Sirius XM's subscribers. Cisco should also be asked to specify the characteristics of the out-of-band emissions that will result from operations under this STA. In addition, Sirius XM asks that OET require Cisco to provide a 24-hour contact number so that any interference that does occur can immediately be resolved.

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

Very truly yours,

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

James S. Blitz
Vice President, Regulatory Counsel

cc: James Burtle, FCC
Ira Keltz, FCC
David Case (davecase@cisco.com)