



May 19, 2009

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th St. SW
Washington DC 20554

Re: Request for Experimental STA File No. 0198-EX-ST-2009

Dear Ms. Dortch:

By letter dated May 15, 2009, Sirius XM Radio Inc. ("Sirius XM") has asked the Commission to condition an experimental license for the 2.3 GHz band so that operations by Cisco in that band meet Part 27 out-of-band emissions limits and other technical requirements. In addition, Sirius XM asks that Cisco specify the characteristics of the out-of-band emissions resulting from its experimental operations. Finally, Sirius XM asks that Cisco provide it with a 24-hour contact number should Sirius wish to contact Cisco about future interference cases involving its commercial satellite radio operations.

Cisco takes very seriously its obligations as an experimental licensee to avoid harmful interference to licensed commercial operations. As explained below, our experimental use of 2.3 GHz is designed to minimize risk of harmful interference.

Cisco's experimental operations relate to its ongoing development of WiMAX technologies. At our on-premises indoor laboratory facilities in Plano, Texas and in San Jose, California, we develop and test WiMAX technologies in anechoic chambers and shielded rooms that block radio signals. We take these precautions because, as new generations of equipment are developed, we must operate and test the radios for compliance with FCC rules. As the Commission will recognize, this is an essential step in the development of radio technology.

Our use of the experimental license in Research Triangle Park, North Carolina, Collin, Texas, and Richfield, Ohio consists of FCC approved equipment that is certified to meet the Part 27 requirements, utilizing an operational environment that complies with

Part 5 experimental rules (e.g., our operations are not protected). We believe that this experimental use raises no issues with respect to harmful interference.

In response to Sirius XM's suggestion that we characterize the out-of-band emissions that will result from the operations of the stay, the characterization is "none." However, if Sirius XM should ever experience harmful interference to its operations that it believes may be caused by Cisco operations in the adjacent band, Sirius should contact David Case at 330-523-2139 or in Richardson, Russ Leath at 214-674-4690. We will immediately assist Sirius XM in its investigation and, if transmitting at 2.3GHz, we will take appropriate steps to remedy the problem.

Based on the above, we do not believe there is a need to condition the license, as Sirius XM has requested.

Respectfully submitted,

CISCO SYSTEMS, INC.

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