

**ORIGINAL**

**XM SATELLITE RADIO**

James S. Blitz  
Vice President, Regulatory Counsel  
XM SATELLITE RADIO  
1500 Eckington Place, NE  
Washington, DC 20002  
[jim.blitz@c\)xmradio.com](mailto:jim.blitz@c)xmradio.com)  
P: 202-380-1383  
F: 202-380-4981

**VIA COURIER**

January 3.2008

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

**FILED/ACCEPTED**  
**JAN - 3 2008**  
Federal Communications Commission  
Office of the Secretary

**Re: Application for Experimental License**  
**File No. 0699-EX-PL-2007**

Dear Ms. Dortch:

On December 17.2007, Comcast WCS ME19. Inc. ("Comcast") applied for an experimental license, File No. 0699-EX-PL-2007, to perform tests with mobile WiMAX equipment on WCS channel blocks A, B, and C in Muncie, Indiana (the "Application").

The Application says Comcast plans to use this experimental license "to determine the applicability of global WiMAX equipment designed for the 2.3-2.4 GHz band . . . to test various technical parameters, such as range, coverage, throughput, latency, reliability, and availability, as well as mobile broadband applications enabled by this technology that may provide additional options for wireless broadband connectivity." Comcast also says it will place "paramount importance . . . on causing no harmful interference" to satellite radio ("SDARS") receivers, and a "significant goal of these tests will be to attempt to determine the maximum operating range of the WiMAX base station and mobile station(s) within which no harmful interference will be caused to SDARS receivers." Application, at Narrative Exhibit, pp. 1-2.

As one of the two SDARS licensees, XM Radio Inc. ("XM") is supportive of the goals set forth in the Application, especially as they relate to testing the potential for interference between operations in the WCS and SDARS bands. While multi-party testing between WCS and SDARS licensees would be a superior mechanism for evaluating the technical parameters and interference scenarios identified the Application,

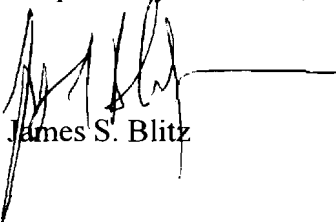
a single-party test of the sort that Comcast proposes in the Application can nonetheless provide useful information in the overall analysis. Along those lines, Sirius Satellite Radio Inc. ("Sirius") recently applied for its own experimental license, File No. 0591-EX-ST-2007, seeking to research the impact of WCS transmissions on satellite radio receivers.

XM supports both Comcast's and Sirius's experimental license applications, to the extent that each test program seeks to ascertain the likelihood of WCS/SDARS interference, consistent with the Commission's recent request for comment in Docket 95-91.<sup>1</sup> Moreover, given the goals and comment timetables in that proceeding, XM encourages the Commission to provide the same consideration to Sirius's experimental license application as it gives to Comcast's application for experimental authority to conduct testing in the WCS band. However, as noted above, XM continues to believe that joint testing among all affected SDARS and WCS parties is likely to produce more reliable results than testing conducted by any one band user, without the full participation of the other band's licensees.

Finally, in order to address any interference that Comcast's testing may create to SDARS receivers, XM requests that Comcast provide a telephone number for an office that will be available on a continuous basis to receive any reports of suspected interference to SDARS operations and take immediate corrective action.

Should any questions arise in connection with this filing, please communicate directly with the undersigned.

Respectfully submitted,



James S. Blitz

cc: David M. Don  
Senior Director, Spectrum Policy  
Comcast Corporation

Julius Knapp, FCC Office of Engineering and Technology  
Bruce Romano, FCC Office of Engineering and Technology

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<sup>1</sup> *Amendment of Part 27 of the Commission's Rules to Govern Operation of Wireless Communications Services in the 2.3 GHz Band; Establishment of Rules and Policies for the Digital Audio Radio Satellite Service in the 2310-2360 MHz Frequency Band*, WT Dkt No. 07-293, IB Dkt. No 95-91, GEN Dkt. No. 90-357, RM No. 8610, FCC 07-215 (rel. Dec. 18, 2007).