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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: Request for Experimental License
Lockheed Martin Corporation, File No. 0547-EX-ST-2007**

Dear Ms. Dortch:

XM Radio Inc. ("XM") hereby comments on the above-referenced application of Lockheed Martin Corporation ("Lockheed") requesting Special Temporary Authority to conduct WiMAX network testing in the entire 2.3 GHz band. Due to the need to prevent potential harmful interference to XM's operations, XM requests that the Office of Engineering and Technology ("OET") prohibit Lockheed from operating on spectrum assigned to XM in that band. OET should also require that Lockheed, in conducting tests on the other requested frequencies in this band, adhere to Part 27 limits governing the technical operations of Wireless Communications Service ("WCS") in the 2.3 GHz band.

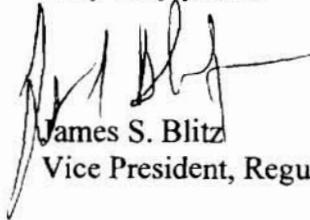
XM is the licensee of a Satellite Digital Audio Radio System ("SDARS") system in the 2332.5-2345 MHz band that provides over 170 channels of high-quality, continuous, multi-channel audio service throughout the United States. Over 8.57 million customers currently subscribe to XM's service.

Lockheed has made no demonstration that its proposed co-channel operations on frequencies assigned to XM would not cause harmful interference to XM's operations. With respect to Lockheed's proposed use of the other spectrum in the 2.3 GHz band, XM urges OET to require any equipment operated pursuant to this application to satisfy the out-of-band emission limits and other technical requirements for operations in the 2.3 GHz WCS 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.

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Should any questions arise in connection with this matter, please contact the undersigned.

Very truly yours,

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

James S. Blitz
Vice President, Regulatory Counsel

cc: James Burtles, FCC
John Kennedy, FCC
Doug Young, FCC
Patrick Thompson (patrick.a.thompson@lmco.com)
Claude Wells (caldue.wells@lmco.com)