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**Informal Objection of Sirius XM Radio Inc. to Persistent Systems, LLC Request for
Experimental Special Temporary Authority, File No. 2412-EX-ST-2019**

Sirius XM Radio Inc. ("Sirius XM"), the licensed provider of Satellite Digital Audio Radio Service ("SDARS") in the 2320-2345 MHz frequencies, is concerned that the operations proposed by Persistent Systems, LLC ("Persistent Systems") in the above-referenced Special Temporary Authority ("STA") request could cause harmful interference to subscribers' reception of the Sirius XM signal. Sirius XM has raised its concerns directly with Persistent Systems in an attempt to reach a mutually acceptable resolution and asks that the Commission defer action on the STA request pending completion of those discussions. At a minimum, any authority granted to Persistent Systems should be conditioned to protect SDARS.

Persistent Systems is seeking authority for fixed operations at center frequencies including 2310 MHz with a 20 MHz occupied channel bandwidth, meaning that the spectrum used would be immediately adjacent to the licensed Sirius XM frequencies. The proposed area of operations within a 50-kilometer radius of Virginia Beach includes the cities of Hampton and Portsmouth as well as Interstates I-664, I-564, I-64, I-264, and I-464. Sirius XM is concerned that at the power levels set forth in the request, the intended experimental operations in the Wireless Communications Service ("WCS") frequencies adjacent to the Sirius XM band would disrupt service to the many Sirius XM subscribers in this very large and heavily populated area.

To avoid the possibility of such service disruption, Sirius XM asked Persistent Systems to delete 2310 MHz from the center frequencies it requests, but to date Persistent Systems has declined to do so. Sirius XM has also requested further information regarding the proposed Persistent Systems operations, including a showing regarding whether they will comply with the WCS out-of-band emission limits imposed in Section 27.53 of the Commission's rules. Persistent Systems has not yet responded to this request.

To ensure that Sirius XM subscribers are protected from interference, Sirius XM asks that the Commission decline to authorize Persistent Systems' use of the 2310 MHz center frequency or any other spectrum within the WCS frequencies unless and until Sirius XM's concerns are resolved. At the very least, the Commission should include in any grant of authority for WCS spectrum a requirement to comply with Section 27.53, consistent with Commission practice in experimental authorizations for these frequencies. *See, e.g., 3G Wireless, LLC, Call Sign WP9XSC, File No. 2258-EX-ST-2019, Grant at 16, Special Condition 5 ("Operations in the WCS bands (2305-2320 MHz and 2345-2360 MHz) must comply with the emission limits applicable to those bands. See 47 C.F.R. § 27.53(a).")*.

Any questions regarding this submission can be addressed to Karis Hastings, outside counsel for Sirius XM, at 202-599-0975, karis@satcomlaw.com.