

SIRIUS XM

RADIO INC.

1500 Eckington Place, N.E.
Washington, D.C. 20002
Tel: 202-380-4000
Fax: 202-380-4500
www.sirius.com www.xmradio.com

FILED/ACCEPTED

MAY - 3 2011

Federal Communications Commission
Office of the Secretary

May 3, 2011

By Hand Delivery

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

**Re: Raytheon Missile Systems
Request for Experimental License
File No. 0192-EX-PL-2011**

Dear Ms. Dortch:

Sirius XM Radio Inc. ("Sirius XM") hereby comments on the above-referenced application of Raytheon Missile Systems ("Raytheon") requesting an experimental license to conduct operations at various frequencies including the 2.3 GHz band. Due to the need to prevent potential harmful interference to Sirius XM's operations, Raytheon should not be authorized to operate in spectrum assigned to Sirius XM. If the Office of Engineering & Technology ("OET") grants Raytheon authority to conduct tests on other 2.3 GHz frequencies, OET should require Raytheon to adhere to existing Part 27 limits for these experimental operations.

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

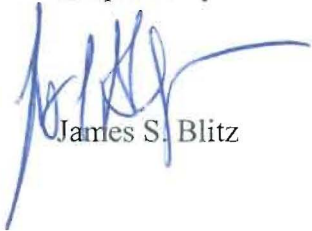
Raytheon's application seeks authority to operate in several frequency bands, including 2310-2360 MHz. Raytheon, however, has made no demonstration that its proposed co-channel operations on frequencies assigned to Sirius XM would not cause harmful interference to Sirius XM's operations. Furthermore, Raytheon has not justified its need for access to frequencies

assigned to Sirius XM in order to conduct its proposed testing. Accordingly, Sirius XM requests that the Sirius XM frequencies be excluded from any grant of the Raytheon license application.¹

With respect to Raytheon's request to use other spectrum in the 2.3 GHz band, Sirius 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 Sirius XM's subscribers.

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

Respectfully submitted,

A handwritten signature in blue ink, appearing to read "James S. Blitz", is written over a printed name.

cc: James Burtles, FCC
John Kennedy, FCC
Doug Young, FCC
Jose Trevino, FCC
Anne Linton-Cortez (alc@conspcinternational.com)

¹ Sirius XM's request is consistent with action by OET in other experimental proceedings. *See, e.g.,* BAE Systems Information and Electronic Systems Integration Inc., Call Sign WD2XJW, File No. 0085-EX-RR-2009, granted effective July 1, 2009 (authorizing experimental operations in the 1215-2700 MHz range but specifying that no operations are permitted in the 2320-2345 MHz band in order to protect SDARS).