



January 3, 2007

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

FILED/ACCEPTED

JAN - 3 2007

Federal Communications Commission
Office of the Secretary

**Re: Runcom Technologies, Ltd.
Request for Experimental Special Temporary Authority
File No. 0903-EX-ST-2006
File No. 0904-EX-ST-2006**

Dear Ms. Dortch:

XM Radio Inc. ("XM") hereby comments on the above-referenced applications filed by Runcom Technologies, Ltd. ("Runcom") on December 19, 2006, requesting Experimental Special Temporary Authority ("STA") to demonstrate technologies in the 2300-2310 MHz band. Due to the need to prevent potential harmful interference to XM's operations, XM requests that the Office of Engineering and Technology ("OET") require Runcom to adhere to existing Part 27 limits for these experimental operations.

XM is the licensee of a Satellite Digital Audio Radio 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 7.2 million customers currently subscribe to XM's service.

In its application, Runcom requests permission to demonstrate the IEEE 802.16e protocol, time division duplexing, OFDM modulation, and the WiBro profile in the 2300-2310 MHz band at the CTIA Wireless 2007 conference to be held at the Orange County Convention Center from March 27 through March 29, 2007. XM urges OET to require that any test equipment Runcom operates in the 2.3 GHz band must satisfy the out-of-band emission limits and other technical requirements for operations in this 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 operations.

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

Very truly yours,

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

James S. Blitz
Vice President, Regulatory Counsel

cc: James Burtles, FCC
John Kennedy, FCC
Doug Young, FCC
Tuvia Lev (info@runcom.com)