



December 19, 2006

FILED/ACCEPTED
DEC 19 2006
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: Samsung Telecommunications America, Inc.
Request for Experimental Special Temporary Authority
File No. 0864-EX-ST-2006**

Dear Ms. Dortch:

XM Radio Inc. ("XM") hereby comments on the above-referenced application filed by Samsung Telecommunications America, Inc. ("Samsung") on November 28, 2006, requesting Experimental Special Temporary Authority ("STA") to demonstrate WiMAX 802.16 technology in the 2300-2320 MHz and 2345-2355 MHz bands. Due to the need to prevent potential harmful interference to XM's operations, XM requests that the Office of Engineering and Technology ("OET") require Samsung to adhere to existing Part 27 limits for these experimental operations.

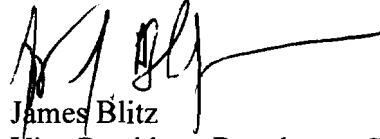
XM is the licensee of a Satellite Digital Audio Radio System ("SDARS") system in the 2332.5-2345 MHz band that provides over 170 channels of high-quality, continuous, multi-channel audio service throughout the United States. Over seven million customers currently subscribe to XM's service.

In its application, Samsung requests permission to demonstrate WiMAX 802.16 technology to users at a tradeshow at the Las Vegas Convention Center from January 8 through January 11, 2007. XM urges OET to require that any test equipment Samsung 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,



James Blitz

Vice President, Regulatory Counsel

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John Kennedy, FCC
Doug Young, FCC
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