

John Kennedy

From: Blitz, James [James.Blitz@xmradio.com]
Sent: Tuesday, March 06, 2007 6:32 PM
To: James Burtle; John Kennedy; Douglas Young; ambroise@sequans.com;
jparker@sta.samsung.com
Subject: Requests for Experimental Special Temporary Authority: Sequans Communications, File No. 0111-EX-ST-2007; Samsung Telecommunications America, File No. 0122-EX-ST-2007
Attachments: Receipt Copy - XM Comments re Samsung and Sequans Devices.pdf

We enclose a copy of a letter filed yesterday concerning the above-referenced applications for experimental STA.



Jim Blitz
V.P., Regulatory Counsel
XM Satellite Radio
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202-380-1383

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RECEIPT COPY

March 5, 2007

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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: Requests for Experimental Special Temporary Authority ("STA")
Sequans Communications, File No. 0111-EX-ST-2007
Samsung Telecommunications America, File No. 0122-EX-ST-2007**

Dear Ms. Dortch:

XM Radio Inc. ("XM") hereby comments on the above-referenced applications of Sequans Communications ("Sequans") and Samsung Telecommunications America ("Samsung") requesting Experimental Special Temporary Authority ("STA") to demonstrate WiMAX 802.16 technology in the 2.3 GHz band at the CTIA tradeshow to be held in Orlando, Florida from March 26 through March 29, 2007. Due to the need to prevent potential harmful interference to XM's operations, XM requests that the Commission limit any grant of these STA requests to operation outside of XM's licensed frequency band (2332.5-2345 MHz) and require the applicants 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 7.7 million customers currently subscribe to XM's service.

In its application, Sequans requests permission to demonstrate WiMAX 802.16 technology in the 2300-2350 MHz band. XM is concerned that operations under this STA using XM's licensed frequency band will result in harmful interference to XM's subscribers. The application does not address this issue. Accordingly, XM requests that, if the Office of Engineering and Technology ("OET") grants the STA, OET require Sequans to operate outside of XM's licensed frequency band (2332.5-2345 MHz).

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Both Sequans and Samsung also request authority to demonstrate WiMAX 802.16 technology in the 2.3 GHz band outside of XM's licensed frequency band. XM urges OET to require any equipment operated in the 2.3 GHz band outside of XM's licensed frequency band (including any equipment permitted to operate in the 2320-2332.5 MHz band, which is licensed to another SDARS licensee) to satisfy the out-of-band emission limits and other technical requirements for operations in the 2.3 GHz Wireless Communications Service ("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.

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

Very truly yours,



James S. Blitz

Vice President, Regulatory Counsel

cc: James Burtle, FCC
John Kennedy, FCC
Doug Young, FCC
Ambroise Popper (ambroise@sequans.com)
Jim Parker (jparker@sta.samsung.com)