

XM Satellite Radio Inc Additional Information
Provided in Response to ATCB Questions dated March 15, 2007
FCC ID BGA-XMXP05
March 19, 2007

Q1) 731 form shows BGAXMXP05 and label shows BGA-XMXP05. Please confirm which is correct and adjust any affected exhibits. Additionally, the 731 form cites XM as the applicant, but I believe the applicant should cite Audiovox. Please review as well.

A1) The label is correct. A new form 731 has been uploaded to reflect the proper ID. XM is the applicant, not Audiovox.

Q2) The test report does not show an FCC ID. Please update the test report with a reference FCC ID to properly show that it is referenced to this application.

A2) A new test report cover page which includes the FCC ID has been uploaded as .pdf file: "FAU Test Report 07-012 Signature Cover-1".

Q3) Page 19 of the users manual appears to suggest the device contains a wireless TX without additional accessories. Please review, explain, and/or correct as necessary.

A3) The Xpress EZ User Guide has been revised and the section of interest is now on page 15, and reads as follows:

Step 4: Making Your Vehicle's FM Radio an XM Radio

Your Xpress^{EZ} contains a built-in FM modulator that requires the use of either the included XM SureConnect or the optional FM Direct Adapter (sold separately) to transmit the XM audio signal to your vehicle's FM radio.

First, turn on your car stereo. You will need to find a suitable FM frequency in order to get the best sound. A suitable FM frequency is an unused frequency or weak station that is not located near a strong FM station in your area. Follow the steps below for more help:

In addition, the Xpress EZ Quick Guide now includes the following statement:

Your Xpress^{EZ} contains a built-in FM modulator that requires the use of either the included XM SureConnect or the optional FM Direct Adapter (sold separately) to transmit the XM audio signal to your vehicle's FM radio.

The revised "Xpress EZ User Guide-1" and "Xpress EZ Quick Guide-1" .pdf documents have been uploaded.

Q4) The manual mentions Audio Level adjustment (page 25). Please comment on how this was adjusted to ensure maximum levels during testing (drive levels, etc.). Please ensure both radiated and occupied bandwidth tests have been performed utilizing maximum user controllable drive levels.

A4) The audio level adjustment referred to on page 25 of the manual controls the audio level to both the audio output jack and to the FM Modulator. During tests the level was set to maximum.

Q5) Because of the FCC's "Permit But Ask" procedures for 15.239 devices, we are now required to submit a certain amount of information to the FCC separately from information already provided in the application. Even if this information may be found within certain exhibits, the FCC requires that we submit the following information in a separate file as part of the "Permit But Ask" procedure. To get this part of the process going, please provide a separate file that provides answers to the following information AS SOON AS POSSIBLE:

- i. Describe the operation of the device.
- ii. Provide information on the device and its antenna.
- iii. How is it installed?
- iv. Describe the test procedure used. (OAT's, In situ, etc.)
- v. If tested in a car, describe how was it configured and tested.
- vi. At the present time, FM transmitters (subject to 15.239) tested in vehicles must also be tested on a test table. Provide both sets of data. All data must be compliant.
- vii. Was the tuning range properly verified? The test lab should indicate in the report that the controls were manually adjusted to verify maximum tuning range.
- viii. Was the bandwidth properly tested with maximum audio input?
- ix. Use a typical audio file from a typical device. e.g. do not use a 1 kHz signal from a signal generator.
- x. Provide the test report showing compliance with the rules.

Note: We are required to submit this information to the FCC prior to approving. In the past we have already attempted to submit a short set of answers to this that referenced the manual, block diagram or other documents, However the FCC has insisted that this be a separate response which summarizes the question with a direct answer to each question. Please provide.

A5) A new file, 'Xpress EZ Permit But Ask Info' with the information requested above has been uploaded.

6) For in vehicle testing, the test report shows that the lowest and highest channels do not appear to be used for testing (88.7 vs 88.1 MHz and 107.1 vs. 107.9). In absence of some compelling argument, the FCC asks that the lowest and highest actually be used – especially for occupied bandwidth tests. Note that 731 form cites 88.1 – 107.9 MHz. Please review.

A6) High level ambient signals present at the test range made testing of 88.1 and 107.9 impractical. Available frequencies were selected as close to the low, mid, and high end of the usable frequency range as possible. For occupied BW, 88.1 MHz and 107.9 MHz were used, as required.

7) Generally the FCC expects all inputs and outputs to be filled during testing and following published requirements of ANSI C63.4. For radiated tests, please define what ports were utilized and justify as appropriate why certain ports may not be filled (i.e. there is a concern with the audio ports for the in car configuration) Please explain, justify, or correct.

A7) For in-vehicle tests, all ports were filled which could be filled without turning off the FM modulator.

Responses to questions 8) through 11) have been uploaded in a separate cover letter 'Response to ATCB Questions 8-11' in order to permit treatment under short-term confidentiality.

FYI's..

12) FYI....When possible, it is best to provide all exhibits in PDF (i.e. block diagram, operational description, parts list, etc.) as this speeds processing time. Note there is no need to adjust this in this application since exhibits have already been reviewed.

13) FYI....In the future, for AC powerline conducted measurements, please provide the 6 highest emissions as directed by ANSI C63.4 section 10.1.8.1

14) FYI....Regarding short term confidentiality, you are responsible for the following:

- a) Note that any documents held under the short-term confidentiality will automatically become public after 45 days. A manufacturer may extend this period up to an additional 45 days. This requires an additional cover letter requesting this extension must be submitted to ATCB a minimum of 7 days prior to the expiration of the original 45 day temporary grant of confidentiality
- b) If the manufacturer engages in public marketing activities or otherwise publicizes the device prior to the expiration of the short-term confidentiality period, the applicant must immediately notify ATCB so the exhibits can be made publicly available.

A12, A13, A14) Understood.