

August 22, 2006

RE: XM Satellite Radio, Inc.

FCC ID: RS2R101B

Please see comments and attachments below regarding the above referenced Application

1. **Q:** Is there any specific communication with the FCC regarding this device? If so, please provide correspondence as appropriate to document this filing

A: We are currently in discussions with the FCC regarding the test results and methodology for this device. We will provide the results of these discussions as they become available.
6. **Q:** It does not appear that the area underneath one of the white coverings was shown in the internal photographs. Please update.

A: Please refer to file named Sportscaster_Front_Internal_Photo.jpg for new internal photograph with the white button label (switch membrane) removed.
7. **Q:** The label does not use the proper format of "FCC ID:" Please correct.

A: Please refer to file named Sportscaster_FCC_Label.pdf for new FCC Label Artwork showing correct FCC ID format.
8. **Q:** A test report and test photographs have not been received on this application and therefore could not be reviewed at this time.

A: Please refer to attached file named (Retlif will provide shortly) for Report of Measurements and Test Setup Photos.
9. **Q:** The user manual (page 4) suggests a built in FM TX. Please explain as an internal FM modulator does not appear part of this application. Also please be clear as to the type of TX possible. For instance, earlier applications appear to suggest a coupler, direct, and XM antenna. If it utilizes an XM antenna for TX. Is this a leaky coax type of transmission? Please provide a detailed explanation as necessary and/or correct the manual if necessary.

A: The manuals were updated, removing the term "wireless", and removing any reference to the XM antenna placement being important for FM modulator performance. Please see attached files named Sportscaster_Manual.pdf and Coupler_Install_Guide.pdf for updated manuals.
10. **Q:** The manual mentions Audio Level adjustment (page 15 -10 levels). 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.

A: In all cases, the audio levels were set to maximum.
11. **Q:** Please provide information to explain the absolute lowest and highest TX frequencies available in the device (manual page 15 – cites 88.1 – 107.9).

A: The device operates from 88.1 MHz to 107.9 MHz.
12. **Q:** Regarding the XM radio configuration tested for radiated emissions, it can not adequately be determined if the device is in compliance with 15.215(b).

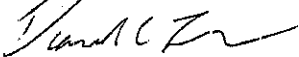
A: The home dock configuration and the car dock configuration for which the FM coupler is not connected, should both be classified as unintentional radiators. In these cases, Sub Part B limits should be applied as opposed to Sub Part C. The submission will be modified to reflect this distinction.
13. **Q:** 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. Please explain, justify, or correct.

A: The Sportscaster unit does not have an audio input jack. The audio output jack, when filled, disables the FM modulator. Therefore, it was not filled during the FM tests.

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14. Q: Please define the RBW/VBW settings utilized for AC powerline conducted tests.
A: Conducted emission measurements were made with quasi peak adapter; RBW = VBW = 9 kHz.
15. Q: It is uncertain if cables were manipulated in effort to obtain worse case data. Has cable placement been explored?
A: Cable placement was randomly peaked at each test frequency tested.

Sincerely,



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