

American Telecommunications Certification Body Inc.

6731 Whittier Ave, McLean, VA 22101

September 18, 2006

RE: XM Satellite Radio, Inc.

FCC ID: RS2SA10101B

After a review of the submitted information, I have a few comments on the above referenced

Application. Depending on your responses, kindly understand there may be additional comments.

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

Answer - Methodology has been discussed in meetings and verbally approved by the FCC. Written communication has been between FCC and ATCB.

2) This device appears to utilize an internal FM modulator. Please explain necessary details to explain if this works in conjunction with the FM direct/coupler, is always on, or a separate configuration.

Answer - The internal FM antenna is no longer used. A series component (C932) was removed in order to remove this antenna for the FM signal path. The schematic provided in the submission paperwork for this product reflects that fact. However, the physical antenna itself was still present during our testing. Since we did not want to subject ourselves to the possibility of having to recertify, we left it in place.

3) The block diagram appears to suggest 3 different forms of FM couplers (one labeled "Sure Connect", one labeled "FM Direct Adapter"). Please explain the differences between these various modes/configurations as necessary (i.e. are they leaky coax, what type of coupling is utilized, is the signal attenuated, length of cable, etc.). For instance, it appears that the FM Direct may replace the FM antenna and therefore be considered a digital device configuration and not actually a wireless configuration. Please comment as necessary and also explain if all variations have been tested? Please ensure this includes a description of operation/function of each.

Answer - 'Sure Connect' is the marketing name for what we have previously been calling the FM Coupler. It couples the FM signal to the car's FM antenna by virtue of its proximity. The 'FM Direct' adapter is inserted between the car's FM antenna and the head unit. When an FM signal is present from the XM unit, the switch disables the car FM antenna, and connects the FM signal directly to the back of the car head unit. When neither the 'Sure Connect' or the 'FM Direct' devices are present, the signal is still present on the cable, but is attenuated by the cable shielding, such that it is not a practical method for connection of the FM signal to the car radio. As mentioned above, all three configurations were tested and found to be compliant.

4) Labeling information should include photographs or diagrams showing placement of the label on the device. Please update.

Answer - New photograph showing label location has been uploaded.

5) Please update the 731 form for an equipment code of DXX.

Answer - New 731 form with equipment code of DXX has been uploaded.

6) Please provide information to explain the absolute lowest and highest TX frequencies for each band available in the device. Note that currently the FCC is asking that the test lab report the minimum/maximum channels that the tuning controls were manually adjusted to verify maximum tuning range and not simply a manufacturer explanation. Please have report updated for this.

Answer - The minimum frequency is 88.1 MHz and the maximum frequency is 107.9 MHz. The adjusted report has been uploaded.

7) It is uncertain if cables were manipulated in effort to obtain worse case data. Has cable placement been explored?

Answer - Cable placement was randomly peaked at each test frequency tested.

8) 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) Please explain, justify, or correct.

Answer - New data is being taken with the audio port populated.

9) 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.

Answer - High level ambient signals present at the OATS 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.

10) It is uncertain what type of glass antennas were present in each vehicle tested and their location. Please provide photographs or information as appropriate to document this.

Answer - The Cadillac Escalade has an FM antenna in the side glass. The Toyota Avalon and the Nissan Maxima have FM antennas in the rear glass.

11) Test equipment for AC conducted emissions do not appear to be provided. Please update.

Answer - Model, serial number and applicable calibration dates for this equipment can be found in the test report in section 4.8 under the sub section titled, 'FAU EMI Lab' and in section 4.2.1 titled 'Test Set up - Conducted Emissions.'

12) Test antenna and preamp (if applicable) do not appear to be provided for OAT's testing.

Answer - Model number, serial number and applicable calibration dates for this equipment can be found in the test report in section 4.8 under the sub section titled, 'In Vehicle Test Set Up.'

13) The users manual cautions the user to not utilize the older docking station. Please explain the differences between the docking station and any influence this may have on the RF and test results of this device.

Answer - The new SkyFi2 receiver, FCC ID RS2SA10101B, has been optimized to work with the FM coupler or FM direct adapter. Old docking station kits do not come with either of these devices. While the new SkyFi2 will operate in the old

dock, it will not provide a strong enough signal to connect properly to the car's radio.

14) The manual mentions Audio Level adjustment (page 15). 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.

Answer - In all cases, the audio levels were set to maximum.

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15) 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.

16) FYI..... Although we are processing this application, as of September 12, 2006 we are also required to work with the FCC to pre-review 15.239 applications and also for FCC to authorize us to release the grants. We must rely on the FCC to release locked FCC ID's in order to do this. Please note that depending on when reviews are actually completed, there may be a delay during which the grants are generated dependent on the FCC.

For the following information, in effort to treat effectively under short-term confidentiality requested, please answer the following items separately as cited below.

17) Please provide a technical description of operation/function of the FM coupler. Please upload this information as a separate exhibit (operational description) to ensure proper treatment of confidentiality.

Answer - See 'confidential response to ATCB comments 091806 RS2SA10101B.doc'

18) Please provide an appropriate installation manual for the coupler and/or direct configurations.

Answer - See 'confidential response to ATCB comments 091806 RS2SA10101B.doc'

19) Regarding the FM coupler, please explain what happens if the XM antenna is directly connected to the docking port and therefore bypasses the coupling module. Would this yield a leaky coax connection? Is it possible to bypass the coupling module this way?

Answer - See 'confidential response to ATCB comments 091806 RS2SA10101B.doc'

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The items indicated above must be submitted before processing can continue on the above referenced application. Failure to provide the requested information may result in application termination. Correspondence should be considered part of the permanent submission and may be viewed from the Internet after a Grant of Equipment Authorization is issued.

Please do not respond to this correspondence using the email reply button. In order for your response to be processed expeditiously, you must submit your documents through the AmericanTCB.com website. Also, please note that partial responses increase processing time and should not be submitted. Any questions about the content of this correspondence should be directed to the sender.