

Retlif Testing Laboratories

795 Marconi Avenue, Ronkonkoma, NY 11779
631-737-1500 - Fax: 631-737-1497

BRANCH LABORATORIES
101 New Boston Road
Goffstown, NH 03045
603-497-4600 Fax 603-497-5281
WASHINGTON
REGULATORY OFFICE
703-533-1614 Fax 703-533-1612



June 12, 2006

RE: XM Satellite Radio, Inc.

FCC ID: RS2SA10177A

Please see comments and attachments below regarding the above referenced Application.

Q: 1) The end of the responses provided cites that the contents of the response are considered confidential. Please note and acknowledge that the response provided can not normally be kept confidential.

A: Retlif Testing Laboratories acknowledges that the responses provided cannot normally be kept confidential.

Q: 2) Labeling must be of the format "FCC ID:", not "FCC:" per 2.925. Please correct.

A: Please refer to the attached file named RodyXt_PAL_Bottom_Label_Artwork2_Rev 4.pdf for revised label artwork.

Q: 3) The previous response to item 3 appears to show snap on ferrites. Snap on ferrites have generally not been allowed (installed or not installed) in the past as it allows the user to remove easily. Your response also cites that they will be configured to avoid tampering. How will this be done? Generally the modification should be molded on, heat shrunk, or any other acceptable manner in which the user can not simply remove. By making a "permanent" connection, the user would have to violate 15.21 to remove. See attached email which cites basic FCC policies regarding ferrites. In addition please note that we are seeking current clarification from the FCC regarding the use of snap on ferrites. We will provide this response once FCC provides a response to us. Typically 1 - 2 business days.

A: Please see attached file named RodyXT_Ferrite_Heat_Shrink_3.JPG showing how XM will be applying heat shrink tubing to all ferrites attached to cables.

Q: 4) Please confirm the previous response to 6, that the length of antenna cable is also not meant to be adjustable by installer (separate from user) as well.

A: The XM antenna is a unique structure for enabling the reception of the XM satellite signal. The cable length is NOT adjustable, neither by the installer nor the end user. In addition, it is permanently affixed to the antenna on one end, and to a unique RF Connector on the other.

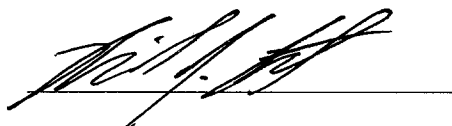
◆Page 2

Q: 5) While the users manual was updated to include the information of Part 15.105, it appears the information required by 15.21 and 15.19 were removed from the latest revision. Note that the device labeling did not include the 2 part FCC statement of 15.19 and therefore this is required to be in the manual as well. Additionally due to the ferrites involved, the manual should also be updated as given in 15.27. From review, it appears the final manual should include appropriate information for 15.19, 15.21, 15.27, and 15.105. Please review.

A: Please refer to the attached file named Vehicle_Install_Guidelines_Rev3_5_061206.pdf, for an updated Installation Manual containing the appropriate information for 15.19, 15.21, 15.27, and 15.105.

Q: 6) Regarding 502 MHz, please note that compliance with 15.209(c) is required regardless of the level at 502 MHz actually meeting the limit. Since 502 MHz is ambient, it is difficult to show compliance to 15.209(c) as tested. However can it be validated that pretesting or reduction of bandwidth showed that any corrected device radiated levels at 502 MHz are lower than fundamental levels?

A: As stated in the previous response, the emission was found to be an ambient. During on site emissions testing, all frequencies upon which emissions were identified during preliminary pre-scans were evaluated. Due to the presence of the ambient interference levels, the BW of the measurement system was reduced to verify that no EUT emission was present. In addition, further review of the prescan data shows the emission at 502 MHz to be approximately 40 dB below the level of the fundamental.



Richard J. Reitz
Corporate Laboratory Manager
Retlif Testing Laboratories
795 Marconi Avenue
Ronkonkoma, NY 11779
(631) 737-1500 x28
(631) 737-1497 fax

www.retlif.com