

SIRIUS XM

RADIO INC.

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December 7, 2009

Via IBFS

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

**Re: Sirius XM Radio Inc.
Request for Extension of 180-Day Special Temporary Authority to Operate
New Low Power Terrestrial Repeaters at Various Locations
File No. SAT-STA-20090410-00042**

Dear Ms. Dortch:

Pursuant to Section 25.120(b)(2) of the Commission's rules, 47 C.F.R. § 25.120(b)(2), Sirius XM Radio Inc. ("Sirius XM"), a satellite radio licensee in the Satellite Digital Audio Radio Service ("SDARS"), hereby requests extension of the above-referenced Special Temporary Authority ("STA") to operate in its licensed frequency band multiple low power terrestrial repeaters, each of which has average Effective Isotropically Radiated Power ("EIRP") of up to 2000 watts. Specifically, the application sought authority to operate 23 new low power repeaters in the former Sirius Satellite Radio Inc. ("Sirius") frequency band (2320-2332.5 MHz) and two new low power repeaters in the former XM Radio Inc. frequency band (2332.5-2345 MHz). Sirius XM requests that the Commission renew this STA for a period of 180 days or until the Commission issues a blanket license for these repeaters. Absent renewal, this STA is scheduled to expire on December 15, 2009.¹

Sirius XM currently operates these repeaters pursuant to the STA granted by the International Bureau on June 18, 2009, File No. SAT-STA-20090410-00042. Sirius XM has not changed

¹ Because this request is timely, pursuant to Section 1.62 of the Rules, this STA will continue in effect without further action by the Commission until such time as the Commission shall make a final determination with respect to this request. *See* 47 C.F.R. § 1.62.

technical parameters for the repeaters since the original grant of the STA and is not herein requesting modification of any of those parameters. Renewing this STA will serve the public interest by enabling Sirius XM to continue providing quality service to subscribers throughout the United States. Without these low power terrestrial repeaters, Sirius XM cannot provide the signal quality that its subscribers expect.

Sirius XM has been using the repeaters authorized in the above-referenced STA for 180 days and is not aware of any incidents where the equipment has caused any interference to other radio services. Sirius XM emphasizes that the repeaters operate at a power level of not more than 2000 watts and at a level which is unlikely to cause any interference. As the Bureau acknowledged in granting Sirius XM's original repeater STA requests, and the WCS licensees have confirmed, operating terrestrial repeaters at an EIRP of 2000 watts or less does not pose interference concerns.²

Sirius XM will continue to comply with the conditions the Commission imposed in granting the above-referenced STA to operate the repeaters. These conditions and the technical parameters of the repeaters have provided sufficient protection to other radio services. Therefore, prompt grant of Sirius XM's extension request will allow for the continued reception of the SDARS signal by subscribers across the country.

Sirius XM hereby certifies that no party to this application is subject to a denial of Federal benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988, 21 U.S.C. § 853(a).

Sirius XM is submitting payment to the Federal Communications Commission in the amount of Two Thousand Eight Hundred Sixty Dollars (\$2860.00) -- the filing fee applicable to requests for STAs for non-geostationary ("NGSO") satellites.³

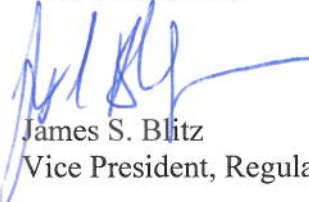
² See *XM Radio, Inc., Application for Special Temporary Authority to Operate Satellite Digital Audio Radio Service Complimentary Terrestrial Repeaters, Order and Authorization*, 16 FCC Rcd. 16781 ¶ 12 ("The comments from WCS licensees express concern about blanketing interference from DARS repeaters that operate with an Equivalent Isotropically Radiated Power (EIRP) above 2 kW."). Moreover, in March 2007, the WCS Coalition said that it will defer from objecting to STA requests that propose operations of no more than 2,000 watts EIRP, even if they do not specify peak or average EIRP, provided that grant of the STA (i) is conditioned on operation on a non-interference basis; and (ii) is subject to the condition that the issue of peak versus average EIRP will be addressed in the pending DARS rulemaking (IB Docket No. 95-91). See Letter from Paul J. Sinderbrand, Counsel to the WCS Coalition, to Ms. Helen Domenici, FCC, File No. SAT-STA-20061207-00145 (March 19, 2007). Sirius XM agrees to these conditions.

³ See *International and Satellite Services Fee Filing Guide* (February 2009).

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Please direct any questions regarding this matter to the undersigned.

Very truly yours,

A handwritten signature in blue ink, appearing to read 'J. Blitz', with a long horizontal flourish extending to the right.

James S. Blitz
Vice President, Regulatory Counsel

cc: Stephen Duall, FCC International Bureau
Jay Whaley, FCC International Bureau
Sankar Persaud, FCC International Bureau