

# SIRIUS XM

RADIO INC.

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March 2, 2011

## Via IBFS

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

**Re: XM Radio Inc.  
Request for Bulk Extension of Special Temporary Authority to Operate  
Terrestrial Repeaters at Various Locations for 180 Days  
FCC File Nos. SAT-STA-20070706-00096; SAT-STA-20080303-00056; SAT-  
STA-20080701-00139; SAT-STA-20081002-00196; SAT-STA-20081218-  
00234; SAT-STA-20050307-00056; SAT-STA-20070706-00095; SAT-STA-  
20020311-00049; SAT-STA-20030325-00056; SAT-STA-20031219-00373**

Dear Ms. Dortch:

Pursuant to Section 25.120(b)(2) of the Commission's rules, 47 C.F.R. § 25.120(b)(2), XM Radio Inc. ("XM"), a satellite radio licensee in the Satellite Digital Audio Radio Service ("SDARS"), hereby requests extension of the ten above-referenced grants of Special Temporary Authority ("STA") to operate terrestrial repeaters.<sup>1</sup> XM requests extension of these STA grants

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<sup>1</sup> The Commission's order adopting rules for satellite radio terrestrial repeaters authorized the International Bureau "to continue to grant STAs for new or modified repeaters ... [until] any permanent authorization to operate SDARS repeaters becomes effective." Amendment of Part 27 of the Commission's Rules to Govern the Operation of Wireless Communications Services in the 2.3 GHz Band; Establishment of Rules and Policies for the Digital Audio Radio Satellite Service in the 2310-2360 MHz Frequency Band, *Report and Order and Second Report and Order*, 25 FCC Rcd 11710, at Para. 264 (2010) (the "*May 20 Order*"). The Commission may not grant these blanket licenses until after the new rules have been approved by the Office of Management and Budget, which has not yet occurred. See 75 Fed. Reg. 45058, 45058 (Aug. 2,

Ms. Marlene H. Dortch

March 2, 2011

Page 2

to operate repeaters in the XM frequency band (2332.5-2345 MHz) at various locations across the United States, for a period of 180 days or until the Commission issues a blanket license for these repeaters pursuant to 47 C.F.R. § 25.144(e), whichever occurs first. Absent renewal, each of these STAs will expire on March 14, 2011.<sup>2</sup>

The *May 20 Order* established mechanisms to facilitate the continued operation of repeaters under STA until the new rules were fully in effect, including directing the Bureau to provide a uniform expiration date for all such STAs:

In order to effect an orderly transition from operations under grants of STA to permanent authority to operate terrestrial repeaters, we instruct the International Bureau to extend all existing grants of STA for SDARS repeaters for a period of 180 days from the release date of this *Second Report and Order*.<sup>3</sup>

The instant application asks that the Bureau grant a bulk STA extension for the ten STA authorizations identified above. XM is currently authorized to operate these repeaters pursuant to multiple STAs granted by the International Bureau on September 15, 2010. XM has not changed technical parameters for the repeaters since the original grants of the STAs and is not herein requesting modification of any of those parameters. Renewing these STAs will serve the public interest by assisting the Bureau to implement the Commission's directive in the *May 20 Order* concerning STA extensions and will enable XM to continue to provide a quality signal to its subscribers at various locations across the United States.

During the time since the referenced STAs were granted, XM has not been made aware of any incidents where its equipment has caused interference to other radio services. None of these

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2010); 76 Fed. Reg. 3892 (Jan. 21, 2011) (requesting public comment on the Part 25 information collection requirements.

<sup>2</sup> Because this request is timely, pursuant to Section 1.62 of the Rules, the listed STAs 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. A similar Request for Bulk STA Extension is being filed for the terrestrial repeater STA grants issued the same day to Sirius XM Radio Inc.

<sup>3</sup> *May 20 Order*, at Para. 264. The *May 20 Order* also allows Sirius XM to request further 180 day extensions of this initial 180 day automatic extension “[i]n the event blanket licenses are not issued within 180 days of the effective date of this Order.” *Id.*, note 615.

Ms. Marlene H. Dortch

March 2, 2011

Page 3

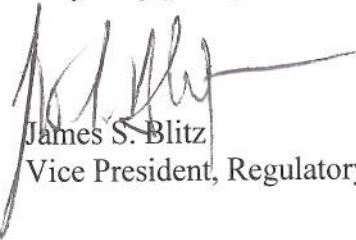
repeaters exceed 12 kw average EIRP, which is the maximum power level the Commission permits in its new rules for satellite radio terrestrial repeaters.<sup>4</sup>

XM will continue to comply with the conditions the Commission imposed in granting the referenced STAs to operate these repeaters. These conditions and the technical parameters of the repeaters have provided sufficient protection to other radio services.

XM is submitting payment to the Federal Communications Commission in the amount of Eight Hundred Thirty Dollars (\$830.00) -- the filing fee applicable to requests for STAs for geostationary ("GSO") satellites.<sup>5</sup>

Please direct any questions regarding this matter to the undersigned.

Very truly yours,



James S. Blitz  
Vice President, Regulatory Counsel

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

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<sup>4</sup> 47 C.F.R. § 25.214(d)(1). The Commission concluded in the *May 20 Order* "that SDARS terrestrial repeaters can operate at an average EIRP of 12 kw with maximum PAPR of 13 dB without causing harmful interference to WCS base station receivers." *Id.* at Para. 243.

<sup>5</sup> See International and Satellite Services Fee Filing Guide (February 2009).