

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: Sirius 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-20050301-00053; SAT-STA-20070710-00097; SAT-
STA-20081020-00206; SAT-STA-20040623-00119; SAT-STA-20040623-
00122; SAT-STA-20020312-00048; SAT-STA-20031219-00369**

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 ten above-referenced grants of Special Temporary Authority ("STA") to operate terrestrial repeaters.¹ Sirius XM requests extension of

¹ 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 Polices 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, 2010); 76 Fed. Reg. 3892 (Jan. 21, 2011) (requesting public comment on the Part 25 information collection requirements).

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these STA grants to operate repeaters in the Sirius XM frequency band (2320-2332.5 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, 2011.²

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*.³

The instant application asks that the Bureau grant a bulk STA extension for the seven STA authorizations identified above. Sirius XM is currently authorized to operate these repeaters pursuant to multiple STAs granted by the International Bureau on September 15, 2010. Sirius 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 Sirius 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, Sirius XM has not been made aware of any incidents where its equipment has caused interference to other radio services. None of these repeaters exceed 12 kw average EIRP, which is the maximum power level the Commission permits in its new rules for satellite radio terrestrial repeaters.⁴

² 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 XM Radio Inc.

³ *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.

⁴ 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.

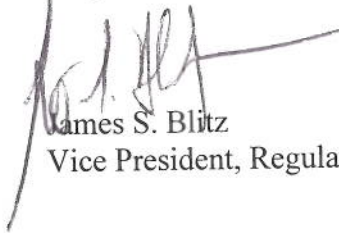
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Sirius XM will continue to comply with the conditions the Commission imposed in granting the referenced STAs to operate these repeaters. These conditions and the technical parameters of the repeaters have provided sufficient protection to other radio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

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.⁵

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

⁵ See International and Satellite Services Fee Filing Guide (February 2009).