SIRIUS XM

RADIO INC.

1500 Eckington Place, N.E.
Washington, D.C. 20002
Tel: 202-380-4000
Fax: 202-380-4500
www.siriusxm.com

June 1, 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

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 multiple grants of Special Temporary Authority ("STA") to operate terrestrial repeaters. Sirius XM requests extension of the STA grants listed in Exhibit A to operate these repeaters in the Sirius frequency band (2320-2332.5MHz) 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, these STAs will expire on the dates indicated in Exhibit A.[1]

The Commission's May 20, 2010 decision adopting formal rules for satellite radio terrestrial repeaters established mechanisms to facilitate the continued operation of repeaters under STA until the new rules were fully in effect, including directing the staff to provide a uniform expiration date for all such STAs:

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[1] 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.

> 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*.[2]

The instant application asks that the Bureau grant the bulk STA extension contemplated in the *May 20 Order*.[3] Incorporating multiple extension applications into a single filing facilitates the STA process going forward by establishing a consistent expiration date for many of XM's repeater STA grants.

Sirius XM currently operates these repeaters pursuant to multiple STAs granted by the International Bureau between December 9, 2010 and January 13, 2011. 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 the referenced STAs have been operating, Sirius XM has not been made aware of any incidents where the equipment has caused any interference to other radio services. None of these repeaters will exceed 12 kw average EIRP, which is the maximum power level the Commission permits in its new rules for satellite radio terrestrial repeaters.[4]

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[2] 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, FCC 10-82, at Para. 264 (released May 20, 2010) (the "*May 20 Order*"). 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. The Commission cannot 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 (Aug. 2, 2010); 76 Fed. Reg. 30706 (May 26, 2011).

[3] A similar Request for Bulk STA Extension is being filed for the terrestrial repeater STA grants issued to XM Radio Inc.

[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.

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

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

Exhibit A

File Number	Grant Date	Expiration Date
SAT-STA-20101015-00221*	12/9/2010	6/7/2011
SAT-STA-20101026-00225*	12/15/2010	6/13/2011
SAT-STA-20101008-00211	12/15/2010	6/15/2011
SAT-STA-20061107-00131	12/21/2010	6/19/2011
SAT-STA-20061013-00121	12/21/2010	6/19/2011
SAT-STA-20090701-00071*	12/21/2010	6/19/2011
SAT-STA-20101118-00240*	1/13/2011	7/12/2011

* STA is also listed on a similar Request for Bulk Extension of Special Temporary Authority that is being filed for the terrestrial repeater STA grants issued to XM Radio Inc. This STA requests authority for one or more repeaters that operate in both the Sirius and XM frequency bands.