

Sirius XM Radio Inc. 1500 Eckington Place NE Washington, DC 20002

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siriusxm.com

September 9, 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 Extension of Blanket Special Temporary Authority to Operate Terrestrial Repeaters at Various Locations for 180 Days FCC File No. SAT-STA-20110128-00018

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"), the satellite radio licensee in the Satellite Digital Audio Radio Service ("SDARS"), hereby requests extension of blanket Special Temporary Authority ("STA") to operate terrestrial repeaters. Sirius XM requests extension of the blanket STA listed above to operate these repeaters in the Sirius frequency band (2320-2332.5 MHz) and 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, this STA will expire on September 19, 2011.¹

The Commission's May 20, 2010 decision adopting rules for satellite radio terrestrial repeaters established mechanisms to facilitate the continued operation of repeaters under STA until the new rules are fully in effect.² One of those procedures authorizes the Bureau "to continue to grant STAs for new or modified repeaters … [until] any permanent authorization to operate SDARS repeaters becomes effective." *See id.*, Para. 264. However, the Commission may not implement the permanent licensing authority afforded by the *2010 Order* until after it announces

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.

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, 25 FCC Rcd 11710, at Para. 264 (2010) (the "2010 Order").

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the effective date of the new rules following their approval by the Office of Management and Budget. No such announcement has yet been issued.³

The instant application will further reduce administrative burdens and facilitate the construction and use of terrestrial repeaters by authorizing the operation of all Sirius XM network repeaters not covered by an existing STA, until such time as the Commission grants a blanket license for Sirius XM repeaters pursuant to Section 25.144 of the Rules, 47 C.F.R. § 25.144. Each repeater authorized under this STA will comply with the new repeater rules as adopted in the *2010 Order*, including the requirements of new Sections 25.202, 25.214, and 25.263 of the Rules, 47 C.F.R. § 25.202, 25.214, and 25.263. This STA will not authorize operation of any repeaters that would require "site-by-site" licensing under Section 25.144(e)(9), 47 C.F.R. § 25.144(e)(9).

Sirius XM has operated within the scope of this STA and is not herein requesting modification of any of its parameters. Renewing this STA will serve the public interest by assisting the Bureau to implement the Commission's directive in the *2010 Order* concerning STA new or modified repeaters 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 Sirius XM has operated under the referenced STA, Sirius XM has not been made aware of any incidents where the equipment has caused interference to other radio services.

Sirius XM will continue to comply with the conditions the Commission imposed in granting the STA to operate the 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.⁴

³ See 75 Fed. Reg. 45058, 45058 (Aug. 2, 2010).

⁴ 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,

for & He

James S. Blitz Vice President, Regulatory Counsel

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