

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554**

In the Matter of Request of )  
 )  
XM RADIO LLC ) Call Sign S2119  
 )  
For Special Temporary Authority to )  
Extend the XM-2 License Term and )  
Permit Relocation in Preparation for Retirement )

*Expedited Action Requested*

**REQUEST FOR SPECIAL TEMPORARY AUTHORITY**

XM Radio LLC (“XM Radio”) respectfully requests special temporary authority (“STA”) for a period of 180 days commencing on March 31, 2014, to extend the license term for the XM-2 space station and permit relocation of the satellite in preparation for its removal to a disposal orbit. Specifically, XM Radio seeks authority to drift XM-2 eastward to 27° W.L. and to maintain it there with an east-west stationkeeping tolerance of +/- 0.1 degrees for a period of up to four months before beginning orbit raising. Grant of the requested authority will serve the public interest by facilitating the orderly retirement of XM-2.

**Background**

XM-2 commenced operations at 115° W.L. on March 31, 2001, with an initial eight-year license term. XM-2 was replaced as a primary operational satellite at 115° W.L. in October 2006, when XM Radio launched XM-4.<sup>1</sup> Since that time, XM-2 has served as an in-

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<sup>1</sup> When launched, XM-2 had an expected useful life of fifteen years. In late August 2001, Boeing Satellite Systems (“BSS”), the satellite manufacturer, advised XM Radio of a progressive degradation problem with the solar array output power of the first generation BSS 702 class satellites, including XM-2. XM Radio accelerated the replacement of XM-2 in response to this issue.

orbit spare at the nominal 85° W.L. and the nominal 115° W.L. orbital locations. XM-2 is currently positioned at 115.25° W.L. with a +/- 0.1 degree east-west stationkeeping tolerance, where it flies in formation with the active XM-4 satellite and XM-1, another in-orbit spare.<sup>2</sup> In 2009, the Commission extended the XM-2 license by five years, to March 31, 2014.<sup>3</sup>

During 2013, XM Radio began to plan for retirement of both XM-2 and XM-1, working closely with BSS. A number of factors have made this planning process especially complex and have extended the time required to complete a detailed strategy for removal of the spacecraft to a disposal orbit. These are the first satellites in the XM Radio fleet and the first spacecraft in the BSS 702 product line to be removed to a disposal orbit. These BSS 702 satellites rely for their on-station propulsion on an electric xenon ion propulsion system (“XIPS”), but also have a traditional liquid bi-propellant system that was used for initial orbit raising following the satellite launch. Either system can be used for the deorbit maneuvers, and both systems must be vented of remaining fuel or gas as part of decommissioning the satellite. Neither Boeing itself nor any other satellite operator has experience with performing maneuvers to remove a BSS 702 model satellite to a disposal orbit using XIPS or with venting the XIPS and bi-propellant systems at the conclusion of the maneuvers.

Ground resources to support the necessary maneuvers are also very limited. XM Radio has access to ground stations in the U.S. and Canada that are equipped to communicate with the satellites in the XM Radio fleet. However, a limited number of ground stations have the tracking capabilities needed to support the satellite deorbit and decommissioning process.

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<sup>2</sup> See File No. SAT-MOD-20101001-00205 (Call Sign S2119) (the “XM-2 2010 Modification”), grant-stamped Nov. 9, 2010 (the “XM-2 2010 Modification Grant”).

<sup>3</sup> See File No. SAT-MOD-20081029-00211 (Call Sign S2119), grant-stamped Mar. 25, 2009.

This limitation is particularly significant because XM-2 is currently positioned over the western U.S., and maneuvers to raise it to a higher disposal orbit will induce a westward drift rate. If XM Radio were to begin the orbit-raising process from XM-2's current orbital location, the satellite would move beyond the range of XM Radio's western ground facilities early in the timeline, and XM Radio would be unable to maintain communications with the spacecraft during critical aspects of the procedure. To avoid this loss of ground contact, XM Radio proposes to drift XM-2 significantly eastward prior to initiating orbit-raising maneuvers.

The Commission has previously approved XM Radio's plan to remove XM-2 to a disposal orbit, and nothing has changed in that plan. Specifically, XM Radio still intends to raise the satellite's orbit at least 313 km above the geostationary arc, which is the altitude derived by application of the IADC standard.<sup>4</sup> XM Radio has calculated that the remaining fuel on board the spacecraft is more than sufficient to perform the necessary maneuvers to reach this altitude.<sup>5</sup> Because the planned disposal orbit altitude complies with the IADC standard, no Commission authority is required for the orbit-raising maneuvers.<sup>6</sup>

XM Radio is not seeking authority to use XM-2 for communications services during the period of the requested STA. The instant STA requests authority solely to permit XM Radio to continue to communicate with XM-2 past its current license term to perform telemetry,

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<sup>4</sup> See File No. SAT-AMD-20080129-00032 (Call Sign S2119), Attachment 1 at 3-4, grant-stamped Feb. 14, 2008.

<sup>5</sup> XM Radio has made the decision to retire XM-2 not because of any fuel constraints but because the performance capabilities of the spacecraft have been detrimentally affected by the issue with its solar arrays. As a result, the satellite has reached the end of its utility to XM Radio as an in-orbit spare.

<sup>6</sup> See 47 C.F.R. § 25.283(b).

tracking and command (“TT&C”) and to relocate the satellite in preparation for orbit-raising maneuvers.

### **Extension Request**

As discussed above, the planning process for removal of XM-2 to a disposal orbit has been unusually protracted, and XM Radio needs to relocate the satellite eastward before orbit raising can begin. Due to these considerations, the steps necessary to place XM-2 in a disposal orbit cannot be completed in advance of March 31, when the satellite’s current license term expires. XM Radio requests STA to extend the XM-2 license authority for a period of 180 days. Grant of the requested extension will facilitate the orderly removal of XM-2 by allowing XM Radio to finalize its plans for the satellite’s retirement and implement the eastward drift of the satellite necessary in preparation for the maneuvers to remove the satellite to a disposal orbit.

### **Relocation Request**

As discussed above, XM Radio also seeks authority to relocate XM-2 to the east in preparation for commencing orbit-raising. The plans and timeline for this maneuver have not yet been finalized, but XM Radio currently anticipates that it will drift XM-2 to 27° W.L. over a period of approximately 45 days beginning in April 2014. XM Radio will communicate with XM-2 during the relocation using a Canadian-licensed ground station. Once XM-2 arrives at 27° W.L., it will remain there for up to four months with an east-west stationkeeping tolerance of +/- 0.1 degrees. This will allow time to vent onboard propellant and otherwise prepare the satellite for decommissioning. Once those processes are complete, it may be necessary to continue to hold the satellite in position so that the orbit raising maneuvers can begin after the eclipse season.

Grant of relocation authority will allow XM Radio to maintain ground contact with XM-2 for a longer period during orbit-raising maneuvers and will therefore serve the public interest. No other operations will be adversely affected. XM Radio will conduct the eastward drift of the spacecraft consistent with industry practice, providing advance notification of the relocation to operators of satellites that will be passed by XM-2 during its relocation and ensuring adequate separation between XM-2 and other spacecraft.<sup>7</sup> Because the 27° W.L. location is unoccupied, XM-2 will not be collocated with any other spacecraft while it remains at this position prior to the commencement of orbit-raising maneuvers.

XM Radio seeks any waiver of Section 25.210(j) of the Commission's rules necessary to permit XM-2 to be maintained at 27° W.L. with a +/-0.1 degree east-west stationkeeping tolerance. Grant of this waiver is consistent with Commission precedent.<sup>8</sup> The requested stationkeeping volume for XM-2 will not overlap with that of any other satellite. Intelsat, which provides TT&C support for XM-2, also operates the satellites on either side of 27° W.L., simplifying coordination of the positions of the three satellites. Thus, authorizing a 0.1 degree east-west stationkeeping tolerance for XM-2 will not adversely affect the operations of any other spacecraft.

For the foregoing reasons, XM Radio respectfully requests special temporary authority for a period of 180 days commencing on March 31, 2014, to extend the XM-2 license term and permit an eastward relocation of the satellite in preparation for retirement. Grant of the

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<sup>7</sup> See XM-2 2010 Modification, Technical Appendix at 5 (describing measures to ensure safe operation during satellite relocation).

<sup>8</sup> See XM-2 2010 Modification Grant at 1-2, ¶ 5 (granting waiver of Section 25.210(j) to permit XM-2 to be operated with an east-west stationkeeping tolerance of +/- 0.1 degrees at the 115.25° W.L. orbital location).

requested authority will serve the public interest by allowing the orderly removal of XM-2 to a disposal orbit.

Respectfully submitted,

XM Radio LLC

/s/ James S. Blitz

James S. Blitz  
Vice President, Regulatory Counsel  
XM Radio LLC  
1500 Eckington Place, N.E.  
Washington, D.C. 20002  
(202) 380-4000

Of Counsel

Karis A. Hastings  
SatCom Law LLC  
1317 F Street, N.W., Suite 400  
Washington, D.C. 20004  
(202) 599-0975

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