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

In the Matter of Request of)	
XM RADIO LLC))	Call Sign S2118
For Extension of Special Temporary Authority For the XM-1 Space Station))	

REQUEST FOR EXTENSION OF STA

XM Radio LLC ("XM Radio") respectfully requests a 180-day extension, through May 20, 2016, of the special temporary authority ("STA") granted in File No. SAT-STA-20150317-00011,¹ which extended the XM-1 satellite's license term, authorized relocation of XM-1 in preparation for its retirement, and approved a revised orbital debris mitigation plan for the satellite. Grant of the requested authority will serve the public interest by facilitating the orderly retirement of XM-1.

In its request for the XM-1 STA, XM Radio described its plan to drift the satellite from 115.25° W.L. to 39° W.L., maintain the satellite temporarily at that location with an east-west stationkeeping tolerance of ± 0.1 degrees while venting excess xenon and bi-propellant, and then raise the satellite to a disposal orbit.² XM Radio explained that under the projected schedule for these maneuvers, the drift of the satellite was expected to begin in mid-June 2015, and the orbit-raising maneuvers would then occur starting in mid-October 2015.³

See XM Radio LLC, Call Sign S2118, File No. SAT-STA-20150317-00011 (the "XM-1 STA"), grant-stamped Apr. 30, 2015.

See XM Radio LLC, Call Sign S2118, File No. SAT-STA-20150317-00011, Narrative at 3-4.
 See id.

XM Radio was not able to maintain that schedule, however, due to circumstances beyond its control. As it has previously explained, XM Radio has access to limited ground resources that are equipped to communicate with its satellite fleet and have the tracking capabilities needed to support the satellite orbit raising and decommissioning process.⁴ As the scheduled date to begin the XM-1 drift approached, issues arose with earth stations outside the U.S. that XM Radio and its affiliates had planned on using to support fleet management and free up a tracking antenna for use with the XM-1 relocation. These issues could not be resolved in time to meet the scheduled date for the XM-1 drift commencement. As a result, the drift was rescheduled to start in October following completion of the fall eclipse season.

Pursuant to the updated schedule, XM Radio now plans to begin relocating XM-1 to 39° W.L. on or about October 15. Depending on how long the propellant venting takes, orbit raising maneuvers will begin between late February and late April 2016. The orbit raising is expected to take approximately two weeks.

⁴ See XM Radio LLC, Call Sign S2118, File No. SAT-STA-20141017-00110, Narrative at 2, grant-stamped Nov. 26, 2014.

In light of this delay in its plans for retirement of XM-1, XM Radio requests

extension of the XM-1 STA for a further 180-day period. Grant of the requested extension of the XM-1 license term and relocation authority will allow XM Radio to relocate the spacecraft eastward, vent excess propellant, and remove the satellite to a disposal orbit. The current term of the XM-1 STA expires on November 22, 2015, and XM Radio requests action on this extension request in advance of that date, with authority for the period from November 22, 2015 to May 20, 2016.

Respectfully submitted,

XM Radio LLC

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

Dated: October 6, 2015

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