



SatCom Law LLC  
1317 F St. NW, Suite 400  
Washington, D.C. 20004  
T 202.599.0975  
www.satcomlaw.com

February 22, 2018

***By Electronic Filing***

Ms. Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12th Street, S.W.  
Washington, D.C. 20554

**Re: Sirius XM Notice of *Ex Parte* Presentation, GN Docket No. 17-183**

Dear Ms. Dortch:

On February 20, 2018, representatives of Sirius XM spoke by telephone with Jennifer Gilsenan, Jose Albuquerque, and Christopher Bair of the FCC's International Bureau to discuss the above-referenced proceeding. Participants in the call on behalf of Sirius XM were James Blitz, Vice President and Regulatory Counsel, Bridget Neville, Senior Vice President Satellite and Terrestrial Engineering and Operations, and the undersigned outside counsel to the company. The discussion focused on the concerns Sirius XM raised in its comments in this docket that new terrestrial services could cause unacceptable interference in the 7.025-7.075 GHz frequencies, the sole feeder link spectrum licensed for Sirius XM's use by the Commission and the sole feeder link spectrum usable to support the provision of Satellite Digital Audio Radio Service ("SDARS") to more than 32 million subscribers.

The Sirius XM representatives specifically raised concerns about the study submitted on behalf of Apple and other companies in late January that purported to show that unlicensed devices could successfully coexist with primary users of the 5.925-7.125 GHz spectrum.<sup>1</sup> Sirius XM stated that it was preparing its own analysis of the interference risks posed by new terrestrial operations in the SDARS feeder link frequencies and that it would submit its study into the record of this proceeding when it is completed.

Sirius XM indicated that its initial review of the RKF Study had highlighted a number of defects with the analysis that call into question the study's conclusions. For example, the RKF Study mentions SDARS operations but includes no analysis of potential interference that is specific to the unique characteristics of SDARS networks. Instead, the RKF Study incorrectly assumes that assessing the risk of interference from terrestrial devices to fixed-satellite service operations is equally applicable to the very different SDARS operating environment. Furthermore, the RKF Study is limited to a discussion of the likelihood of interference and does not consider the magnitude of the harm that would be caused to the SDARS network or the

---

<sup>1</sup> See Frequency Sharing for Radio Local Area Networks in the 6 GHz Band, prepared by RKF Engineering Services, LLC, Attachment to *Ex Parte* Filing of Apple Inc. *et al.*, GN Docket No. 17-183, filed Jan. 25, 2018 (the "RKF Study").

impact on reception by SDARS subscribers if interference does occur. The participants also discussed the fact that the RKF Study is heavily reliant on a wide range of unsupported and questionable assumptions regarding terrestrial devices' operating and deployment characteristics and required protection criteria for satellite signal reception.

In addition, Sirius XM noted that the RKF Study focuses only on the risk of aggregate interference from terrestrial devices to the received signal quality at the antenna onboard the spacecraft. Sirius XM emphasized that this approach fails to address the very real possibility that significant numbers of terrestrial devices located near the Sirius XM feeder link sites on the ground could introduce interference into the transmission that is uplinked to the SDARS fleet, corrupting the programming delivery to Sirius XM's tens of millions of subscribers.

The participants also discussed the particular dangers associated with deployment of unlicensed devices using Sirius XM feeder link spectrum. Sirius XM reiterated its concern that once devices are in the hands of end users, the Commission will have little or no ability to manage interference issues should they arise. As the Sirius XM comments make clear, Sirius XM does not object to sharing its feeder link spectrum – indeed, those frequencies are also used today by terrestrial Fixed Service licensees as well as by the Broadcast Auxiliary Service. Such uses, all of which rely on transmitters at fixed locations, can readily be coordinated with the relatively small number of Sirius XM feeder link sites. In contrast, it is impossible to ensure that unlicensed terminals operated by consumers are effectively excluded from the vicinity of Sirius XM uplink earth station antennas.

Please address any questions regarding these matters to the undersigned.

Respectfully submitted,

*/s/ Karis A. Hastings*

Karis A. Hastings  
Counsel for Sirius XM  
[karis@satcomlaw.com](mailto:karis@satcomlaw.com)

cc: Jose Albuquerque  
Christopher Bair  
Jennifer Gilsenan