

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

In the Matter of)	
)	
AT&T Petition for Rulemaking Regarding)	RM-11731
Revision of WCS Rules)	
)	

To: The Commission

REPLY COMMENTS OF GARMIN INTERNATIONAL, INC.

Garmin International, Inc. (“Garmin”), by its counsel, hereby submits its reply comments in response to the Public Notice, “Wireless Telecommunications Bureau Seeks Comment on AT&T Petition for Rulemaking Regarding Revision of WCS Rules,” DA 14-1210, RM-11731, released by the Commission’s Wireless Telecommunications Bureau (“Bureau”) on August 21, 2014 (“Public Notice”). These reply comments are submitted to inform the Commission of developments since Garmin filed its initial comments in this proceeding.¹

Sirius XM and Garmin have consulted concerning the issues raised in Garmin’s initial comments. Sirius XM has assured Garmin that its analysis specifically included potential impacts on aviation uses of its service. Sirius XM provided additional information to Garmin concerning the expected operational parameters of the proposed in-air connectivity service and potential interference to aviation users of Sirius XM service and confirmed that the coordination agreement filed with the Commission on September 22, 2014 addresses interference to aviation users. Sirius XM also provided assurances to Garmin that it will enforce the terms of the

¹ Comments of Garmin International, Inc., filed September 22, 2014.

coordination agreement, if necessary, to prevent harmful interference to aviation users.² In light of these discussions, Garmin has determined that the issues raised in its comments now have been addressed by Sirius XM.

Respectfully submitted,

GARMIN INTERNATIONAL, INC.

By _____ /s/

M. Anne Swanson

J.G. Harrington

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October 6, 2014

² See Letter from Craig Wadin, Senior Vice President RF Systems, Sirius XM to Phil Straub, Vice President, Managing Director – Aviation, Garmin, Oct. 3, 2014, attached hereto as Exhibit 1.

Exhibit 1

Letter from Craig Wadin, Sirius XM, to Phil Straub, Garmin



Sirius XM Radio Inc.
3161 SW 10th Street
Deerfield Beach, FL 33442

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siriusxm.com

October 3, 2014

By Email

Mr. Phil Straub
Vice President, Managing Director – Aviation
Garmin International, Inc.
1200 East 151st St.
Olathe, KS 66062

Dear Mr. Straub:

I am Sirius XM's Senior Vice President RF Systems and in that capacity, I was directly involved in the discussions leading to the coordination agreement between Sirius XM and AT&T Services Inc. (the "Coordination Agreement") that those companies jointly filed with the FCC in RM-11731 on September 22, 2014. I am also aware that Garmin International, Inc. filed comments in the FCC proceeding on that day (the "Comments"). I am authorized by Sirius XM to make the assurances contained in this letter.

Sirius XM's analysis of the interference potential of AT&T's proposed air-to-ground ("ATG") service included the ATG's service's potential impact on Sirius XM's aviation customers. Sirius XM has provided Garmin additional information concerning the potential for interference to Sirius XM'S aviation users from the ATG service as proposed by AT&T and confirmed that the Coordination Agreement addresses interference to all satellite radio receivers, including those used in aviation. Sirius XM also assures Garmin that it will enforce the Coordination Agreement to address harmful interference that SiriusXM identifies to satellite radio reception, including interference that may be received by aviation users.

Based on the engineering analysis provided by Sirius XM and as confirmed in this letter, we understand that Garmin will advise the FCC that the concerns raised in the Comments have been fully addressed.

Very truly yours,

Craig Wadin
Senior Vice President RF Systems

Certificate of Service

I hereby certify that I caused a copy of the foregoing "Comments of Garmin International, Inc." to be mailed via First Class mail, prepaid, to the following on this date:

William L. Roughton, Jr.
Michael P. Goggin
Gary L. Phillips
Lori A. Fink
AT&T Services, Inc.
1120 Twentieth Street, N.W.
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Washington, DC 20036

_____/s/_____
Cynthia Porter

Dated: October 6, 2014