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Phil Boyer
President

July 9, 2007

The Honorable Marlene H. Dortch
Federal Communication Commission
445 12th Street, S.W.
Washington, DC 20554

**Re: MB Docket Number 07-57 Consolidated Application for Authority to
Transfer Control of XM Radio Inc. and Sirius Satellite Radio Inc**

Dear Secretary Dortch:

On behalf of more than 412,000 members, the Aircraft Owners and Pilots Association (AOPA) offers the following comments to the Federal Communication Commission (FCC) on the issue of transferring control of XM Radio Inc. and Sirius Satellite Radio Inc. The Association is commenting because weather via satellite has provided important safety enhancements for thousands of pilots and it is important this service continue. We offer these comments on parameters that the FCC should consider as it evaluates the proposed consolidation.

From an aviation safety perspective, the proposed consolidation of XM Radio and Sirius Satellite Radio must result in continued provision of weather service. Maintaining the service at reasonable prices to subscribers is important, as well the ability for current customers to continue using existing satellite radio receivers.

Without a doubt, satellite radio improves safety for aviation. This is because satellites transmit precise, timely and reliable weather information directly to the aircraft and the radio continuously receives and updates the weather during flight. Presented graphically, pilots have real time access to critical information on severe thunderstorms, airman's meteorological information, wind speed and direction, temperature, current and forecast conditions for airports, and other climatic indicators.

It is important to recognize that weather information is only beneficial if it is affordable to pilots. First, the existing subscription pricing should not increase because of the merger. Based on the XM filing, which indicates that audio programming content will continue at current prices, AOPA would expect the same assurances for the graphical data used in aviation. Lower subscription pricing would serve to improve aviation safety.

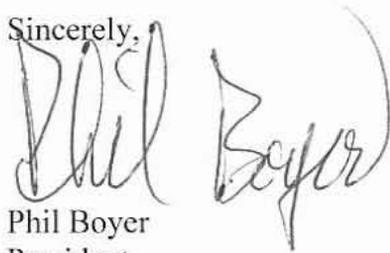
The Honorable Marlene H. Dortch

Page 2

Secondly, current users of XM and Sirius data services should not be required to modify or replace their existing radio equipment in order to continue receiving weather data. The cost to purchase and install satellite radio systems in aircraft can be quite high. For example, a permanently mounted digital radio receiver lists for \$4995, and with the necessary computer display, total costs may exceed \$10,000. Aircraft owners should not be required to pay for additional hardware or labor costs as a result of the consolidation.

AOPA appreciates the FCC's efforts to solicit and review comments on the proposed consolidation. Satellite radio services are beneficial, and the FCC should ensure that the consolidation eliminates questions about its future, and does not result in price increases.

Sincerely,

A handwritten signature in black ink, appearing to read "Phil Boyer". The signature is written in a cursive, flowing style. The first name "Phil" is written in a larger, more prominent script, and "Boyer" follows in a similar but slightly smaller script. The signature is positioned to the right of the word "Sincerely,".

Phil Boyer
President