

Pioneer North America, Inc.  
8000 Towers Crescent Dr., 13th Floor  
Vienna, VA 22182

June 26, 2008

VIA ECFS AND E-MAIL

Ms. Marlene Dortch  
Secretary  
Federal Communications Commission  
445 12th Street, SW  
Washington, DC 20554

Re: Ex Parte notice, MB Docket No. 07-57

Dear Ms. Dortch:

On June 25, 2008, the undersigned met with Christina Pauzé, Legal Advisor to Commissioner McDowell, Nick Campisano and Joanna Ng, of Commissioner McDowell's office regarding certain proposed conditions to the proposed merger of Sirius Satellite Radio Inc. ("Sirius") and XM Radio Inc. ("XM").

At the meetings, I reiterated our position that Pioneer North America, Inc. ("PNA") does not take a position as to whether the proposed merger should be approved. However, iBiquity Digital Corporation ("iBiquity") has proposed certain conditions on the merger, should it be approved.<sup>1</sup> I explained PNA's opposition to these conditions, and provided copies of the attached product literature for existing Pioneer products.

The iBiquity condition would limit the breadth of radio product offerings to consumers, limiting consumer choices. There are myriad features which may be incorporated into home, mobile and OEM automotive products and each product incorporates one or several of them. Eliminating the product choice of whether to include HD Radio or not in a particular product cuts by at least half the number of choices we may offer to our customers.

The condition would limit which radio component suppliers' products be designed into radios, granting some form of oligopoly to iBiquity and component manufacturers that incorporate iBiquity technology. This could yield predatory practices on the part of the technology vendors. Furthermore, existing AM/FM/HD components have poorer AM/FM reception capability than the existing AM/FM devices. This condition would have the effect of decreasing AM/FM tuning performance, while at the same time significantly increasing consumer prices (even for consumers uninterested in HD Radio).

Moreover, the condition would interfere with the useful and healthy free market mechanisms extant in radio electronics purchases. Free terrestrial analog and terrestrial

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<sup>1</sup> See Letter from Albert Shuldiner and Robert A. Mazer, *May 1, 2008*.

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digital radio services should be allowed to compete with paid satellite digital radio services on an even playing field. Consumers should be allowed to choose radios which meet their needs, without undue government influence.

It is our belief that HD Radio should compete in the marketplace with other radio services: if free local digital terrestrial radio services are compelling to consumers, HD Radio technology will succeed in the marketplace. In this case, the free market is the best measure of the public interest.

In accordance with §1.1206 of the Commission's Rules, one copy of this letter is being filed electronically via ECFS, and delivered via email to each participant.

Regards,

A handwritten signature in blue ink, appearing to read "Adam Goldberg".

Adam Goldberg  
Vice President  
Government and Industry Affairs  
Pioneer North America, Inc.  
(703) 846-3650

Attachments (3)

Cc: Christina Pauzé  
Nick Campisano  
Joanna Ng

- NAVIGATION
  - In-Dash Navigation**
  - Portable Navigation
  - Accessories
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### In-Dash Navigation

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### AVIC-F90BT

Premier In-Dash Navigation AV Receiver with DVD Playback and Built-In Bluetooth

- Use your voice to control your iPod® and phone calls
- iPod® Audio/Video Cable (CD-IU230V) included
- Hi-Volt Pre-Outs x3 (4.0V)

Suggested Price: \$1,200.00

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- SPECIFICATIONS
- ACCESSORIES**
- DOCUMENTS



#### GEX-P10HD

##### HD Radio Tuner

Enjoy high-quality HD Radio broadcasts with this add-on HD tuner.



#### CD-SB10

##### Sirius Bus Interface

For use with Pioneer "SAT Radio Ready" Headunits and AV Receivers. Sirius Satellite Radio subscription required, sold separately. SC-C1 required for operation and sold separately.



#### GEX-P920XM

##### XM Satellite Radio Tuner

Enjoy over 150 channels of XM Radio® audio service with this add-on XM tuner. XM Satellite Radio subscription required, sold separately.



#### ND-BC2

##### Universal Rear-View Camera

Get a better view while backing up, or keep an eye on your trailer when towing. A Pioneer Rear-View Camera adds indispensable safety and convenience.



#### ND-BC20PA

##### Universal Rear-View Camera with Parking Assist

Rear-View Camera with special Visual DSP processing, providing image correction, parking assist modes and more.

*NOTE: Do not use your AVIC-F90BT while driving if doing so will divert your attention in any way from the safe operation of your vehicle. Always observe safe driving rules. In some states certain operations of your AVIC-F90BT while driving may be illegal. Where such regulations apply, they must be obeyed.*

*XM Satellite Radio is a subscription service not affiliated with Pioneer Electronics - service is available only in the 48 continental U.S. states (not available in Alaska, Hawaii, or U.S. territories). More information is available at [www.xmradio.com](http://www.xmradio.com).  
Sirius Satellite Radio is a subscription service not affiliated with Pioneer Electronics - service is available only in the 48 continental U.S. states (not available in Alaska, Hawaii, or U.S. territories). More information is available at [www.siriusradio.com](http://www.siriusradio.com).*

*Note: The rear view camera is NOT intended for entertainment purposes. It is specifically designed to allow the driver to observe a towed boat or vehicle during transport. The optional rear view camera must be a "reversed image" type.*



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Here is an "Inside Look" e the new features in our AV F-Series Navigation line.



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- Important: Notice about AVIC-Z1/Z2 Firmware Lock-up/Freezing Issu
- Notice about AVIC-S1 Update
- Notice about Free Firr Update for AVIC-S2 to Certain Service Issues
- Notice and FAQ about Flex-Cable for Flip Scr Navigation Models AVI AVIC-N2

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## Satellite Radio

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### GEX-P920XM

XM Digital Satellite Tuner for Pioneer Headunits

- Listen to XM Radio (Subscription Required)
- Use with Pioneer "SAT Radio Ready" Headunits/Receivers
- 170 Channels available Coast-to-Coast

\$100.00

BUY NOW

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PRODUCT OVERVIEW

SPECIFICATIONS

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XM Radio Tuner designed for Pioneer "SAT Radio Ready" and "XM Ready" Headunits and AV Receivers. Also features display information such as Channel Name, Channel Category, Artist/Feature Name, Song/Program Title, or Composer.

Enjoy all of the benefits of XM Radio, including:

- Over 170 Digital Channels Coast to Coast
- Over 80,000 Hours of Entertainment Each Month
- Live Concerts and Exclusive Interviews
- Official Satellite Radio Network of Major League Baseball® – Every Team. All Season Long.
- Exclusive Satellite Radio Network of NASCAR®. Every Race. Every Turn.
- Only XM features MTV, VH1, Opie & Anthony, Bob Edwards, College Sports from ACC, Big Ten and PAC-10

Note: This product cannot be used with the head units listed below.  
AVH-P6400CD, AVH-P6400, DEH-P8500MP, DEH-P850MP, KEH-P2030

*Hardware and required monthly subscription sold separately. Premium channel available at additional monthly fee. Other fees and taxes, including a one-time activation fee apply. Subscription fee is consumer only. All fees and programming subject to change. Subscriptions subject to Customer Agreement included with the XM Welcome Kit and available at xmradio.com. Only available in the 48 contiguous United States. Live reception of satellite signal may vary by location. ©2005 XM Satellite Radio Inc. All rights reserved. NASCAR® is a registered trademark of the National Association for Stock Car Audio Racing, Inc. Major League Baseball trademarks and copyrights are used with permission of Major League Baseball Properties, Inc. Visit the official website at MLB.com. All other trademarks are the property of their respective owners. XM Satellite Radio Inc.*  
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### Audio Components

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#### GEX-P10HD

HD Radio Tuner for use with "HD Radio Ready" Pioneer Headunits

\$100.00

BUY NOW

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PRODUCT OVERVIEW

DOCUMENTS

Designed to receive high-quality HD Radio broadcasts for most Pioneer car stereos, this HD Radio tuner is a hideaway module that connects through the Pioneer headunit's IP-BUS interface.

#### What is HD Radio?

HD Radio is the only system for digital AM and FM broadcasting in the U.S. Currently more than 1,000 radio stations are broadcasting primary signals in digital HD Radio technology, as a free service. That's right, no subscription charges!

Compatible with the following Pioneer headunits:

- FH-P800BT, FH-P8000BT, DEH-P700BT, DEH-P7000BT

"External Control" capable with other Pioneer IP-Bus headunits, a/v receivers and navigation systems, with some limitations of display and control. Please review Owner's Manual(s) for more details.



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SIR-PNR2

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SIR-PNR2

Sirius Digital Satellite Tuner for Pioneer Headunits

- Listen to Sirius Radio (Subscription Required)
- Use with Pioneer "SAT Radio Ready" Headunits
- New Game Alert and Game Zone features

\$100.00

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PRODUCT OVERVIEW

SPECIFICATIONS

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**Stay Tuned to the Digital-Quality Sound On-board: SIRIUS Satellite Radio**

Enjoy SIRIUS Satellite Radio on board! In conjunction with Pioneer "SAT Radio Ready" headunits, the SIR-PNR2 offers crisp, digital-quality sound from over 120 channels — including 65 channels for commercial-free music and more than 50 for sports (NFL, NBA, NHL games and others), news, and a wide array of entertainment programs.



SIRIUS Satellite Radio also boasts stable signal transmission to tuners. Three powerful SIRIUS satellites fly directly over the U.S. at high elevation angles, ensuring coast-to-coast coverage. The satellites' "clear line of sight" keeps drivers tuned to the selected channels without obstruction from buildings or trees.

The SIR-PNR2 is a SIRIUS Digital Satellite Tuner for use with Pioneer "SAT Radio Ready" Headunits and AV Receivers. Features IP-Bus Input and Output, Single-Pole Sirius Antenna included, and 1-year Warranty. New features for this model include:

- Game Alert: Prompts when your favorite teams are playing at start of game and when scores
- Game Zone: Lists your favorite teams' scores

*Note: Check Owners Manual for feature compatibility.*

**Compatible with the following 2007 Pioneer models:**

- [AVIC-Z2](#), [AVIC-D3](#), [AVIC-N4](#)
- [AVH-P7800DVD](#), [AVH-P6800DVD](#), [AVH-P5900DVD](#)
- [DEH-P9800BT](#), [DEH-P7900BT](#), [DEH-P6900UB](#), [DEH-P5900IB](#), [DEH-P4900IB](#), [DEH-P3900MP](#), [DEH-P2900MP](#)
- [DEH-P980BT](#), [DEH-P880PRS](#), [DEH-P790BT](#), [DEH-P690UB](#), [DEH-P590IB](#), [DEH-P490IB](#), [DEH-P390MP](#)

**Previous Models with Full Sirius Control:**

- AVIC-Z1
- DEH-P7800MP, DEH-P6800MP, DEH-P4800MP, DEH-P3800MP
- DEH-P780MP, DEH-P680MP, DEH-P480MP

The following models can control the SIR-PNR2 through "External Unit Control", with some limitations in operation and display. Please consult the owners manual for more details.

- 2006 Models: [AVIC-N3](#), [AVIC-D2](#), [DEH-P5800MP](#), [DEH-P580MP](#)
- Older Models: [AVIC-N2](#), [AVIC-N1](#), [AVIC-D1](#), [AVH-P7500DVD](#), [AVH-P6600DVD](#), [AVH-P5700DVD](#), [DVH-P5000MP](#), [DEH-P9600MP](#), [DEH-P8600MP](#), [DEH-P80MP](#), [DEH-P7700MP](#), [DEH-P6700MP](#), [DEH-P4700MP](#), [DEH-P3700MP](#), [FH-P5000MP](#), [FH-P4200MP](#), [DEH-P77DH](#), [DEH-P47DH](#), [DEX-P9](#), [DEH-P960MP](#), [DEH-P860MP](#), [DEH-P8MP](#), [DEH-P770MP](#), [DEH-P670MP](#), and [DEH-P470MP](#)

All 2005 and previous model year CD Players, AV Receivers and Navigation Systems control the SIR-PNR2 through "External Unit" compatibility only. This includes 1-line, 8-character display and basic operation features. Consult the Owner's Manual for more details.

*Note: SIRIUS Satellite Radio subscription required — service is available only in the 48 Continental U.S. states (not available in Alaska, Hawaii, or U.S. territories). For more information on SIRIUS Satellite Radio, visit [www.siriusradio.com](http://www.siriusradio.com).*



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