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April 23, 2010

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JAMA

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
445 Twelfth Street, SW
Washington, DC 20554

Re: IB Docket No. 95-91, WT Docket, No. 07-293, and
GN Docket Nos. 09-47, 09-51, and 09-137

Dear Ms. Dortch:

The Technical Affairs Committee of the Association of International Automobile Manufacturers, Inc. (AIAM)¹ wishes to express its concern with the recently proposed changes to the WCS service rules.² In our earlier filing in this proceeding, AIAM said that allowing mobile transmissions in the WCS band creates a significant risk of interference to in-vehicle reception and we asked the Commission to invite comment on specific proposals before it modifies the WCS rules. We appreciate this opportunity to provide this further input.

AIAM is concerned that the current proposal for changes to the WCS service rules disregards extensive evidence in the record demonstrating that absent effective safeguards, satellite radio reception will be degraded by WCS mobile operations. Sirius XM has spent billions of dollars developing networks that are based on its reasonable expectation that the Commission would not allow mobile WCS devices. Automakers have installed tens of millions of satellite radios in their vehicles with that same understanding.

If the Commission loosens the WCS rules, it should also adopt provisions that will effectively protect satellite radio listeners who experience interference

¹ AIAM Technical Affairs Committee members are American Honda Motor Co., American Suzuki Motor Corp., Aston Martin Lagonda of North America, Inc., Ferrari North America, Inc., Hyundai Motor America, Isuzu Motors America LLC, Kia Motors America, Inc., Mahindra & Mahindra Ltd., Maserati North America, Inc., McLaren Automotive Ltd., Nissan North America, Inc., Peugeot Motors of America, Subaru of America, ADVICS North America, Inc., Delphi Corporation, Denso International America, Inc., and Robert Bosch Corporation.

² Commission Staff Requests That Interested Parties Supplement the Record On Draft Interference Rules For Wireless Communications Service and Satellite Digital Audio Radio Service (DA 10-592, released April 2, 2010)

from WCS operations. As an integral part of modified WCS rules, the Commission should require any WCS operator causing interference to satellite radio to promptly eliminate the interference or discontinue its operations. The Commission should also adopt a streamlined process to ensure that consumers have an effective remedy if the situation requires government intervention.

Other automobile manufacturers and trade associations have already gone on record in this proceeding with similar concerns. Our common position reflects the importance of satellite radio to our customers and the challenges WCS rule changes would present to us. We hope any revisions to the WCS rules will fully protect the millions of consumers who rely on satellite radio in their automobiles.

Sincerely,



Michael X. Cammisa
Director, Safety

cc: The Honorable Julius Genachowski
The Honorable Michael J. Copps
The Honorable Robert M. McDowell
The Honorable Mignon Clyburn
The Honorable Meredith Attwell Baker
Mr. Julius Knapp

