

April 23, 2010

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

Re: WT Docket, No. 07-293, IB Docket No. 95-91, GEN Docket No. 90-357,
and RM No. 8610

Dear Ms. Dortch:

Nissan North America, Inc. wishes to convey to you the customer and business impact the recently proposed changes to the WCS service rules could generate.¹ In our previous filings in this proceeding, we 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.

Consistent with our request for a comment period, we appreciate this opportunity to provide this further input. We believe the FCC staff may not fully appreciate the potential adverse impact upon millions of consumers resulting from the staff's current proposal, which disregards extensive evidence in the record demonstrating that absent effective safeguards, satellite radio reception will be degraded by WCS mobile operations. Nissan North America and other manufacturers have installed tens of millions of satellite radios in their vehicles with the expectation consumers will have interference-free reception. Our Nissan and Infiniti consumers and millions of consumers with other brand vehicles have invested billions of dollars in satellite technology in their vehicles and homes. We are advised Sirius XM itself has spent billions of dollars developing networks that are based on its reasonable expectation that the Commission would not allow mobile WCS devices or at least it would ensure the integrity of the current broadcast capability.

We urge you that if the Commission loosens the WCS rules, it should also adopt provisions that will effectively protect satellite radio listeners who experience interference from WCS operations. As an integral part of modified WCS rules, the

¹ 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). The deadline for filing comments has been extended to April 23, 2010.

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 significant investments and importance of satellite radio to our customers and the challenges WCS rule changes would present to millions of consumers and our businesses. We hope any revisions to the WCS rules will fully protect the millions of consumers who rely on satellite radio in their automobiles.

Sincerely,

A handwritten signature in black ink that reads "Kenneth Kcomt". The signature is written in a cursive style with a large, sweeping initial 'K'.

Kenneth Kcomt
Director, Product Planning

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