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January 23, 2012

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

Re: Notice of Oral *Ex Parte* Presentation
WT Docket No. 07-293; IB Docket No. 95-91

Dear Ms. Dortch:

In accordance with Section 1.1206 of the Commission's rules, 47 C.F.R. § 1.1206, this letter notifies the Commission that on January 19, 2012, representatives from Sirius XM Radio Inc. ("Sirius XM") met with staff from the Office of Engineering and Technology ("OET") and the Wireless Telecommunications Bureau ("WTB").

Participating in the meeting were Terrence Smith, Craig Wadin, Riza Akturan and James Blitz from Sirius XM, and myself. We spoke with Julius Knapp, Ron Repasi and Pat Forster from OET and Linda Chang, Paul Moon and Moslem Sawez from WTB.

Sirius XM reiterated positions and recommendations detailed in its previously filed pleadings in the above-referenced dockets.¹ Sirius XM expressed appreciation for the Commission's efforts to adopt appropriate technical standards for WCS devices and comprehensive coordination requirements as well as its commitment to resolve harmful interference if it should occur. Sirius XM explained that the protections the Commission adopted in May 2010 Report and Order were minimally necessary to protect satellite radio service from interference caused by mobile WCS services. Despite these protections, Sirius XM remains convinced that satellite radio consumers will experience harmful interference from mobile WCS devices and therefore encouraged efforts to explore other uses of the WCS spectrum – such as

¹ See e.g., Petition For Partial Reconsideration and Clarification of Sirius XM Radio Inc., WT Docket No. 07-293, (filed Sept. 1, 2010); Sirius XM Radio Inc. Reply To Oppositions Of The WCS Coalition And AT&T Inc., WT Docket No. 07-293, (filed Nov. 2, 2010); Letter from James S. Blitz, Terrence R. Smith, Sirius XM Radio Inc. to Marlene H. Dortch, Secretary, Federal Communications Commission, WT Docket No. 07-293, (filed January 11, 2012) (the "January 11 Ex Parte").

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the ground-to-air service recently proposed by GoGo, Inc.² – that may be more compatible with adjacent band users.

Consistent with its positions expressed in previous meetings and the January 11 Ex Parte, Sirius XM urged the Commission to reject the WCS Coalition's recommendations to eliminate or modify the power spectral density limits and the WCS uplink duty cycle limits. Sirius XM stated that these recommendations are premised on the perceived capabilities of LTE technology but that no supportive test data exists in the record. Sirius XM also reiterated its recommendations that the Commission maintain the current prohibition against outdoor installation of WCS fixed consumer premises equipment and affirm and strengthen the inter-service coordination requirements between WCS and satellite radio licensees.

In response to the staff's questions, Sirius XM explained that consumer-oriented satellite radio receivers provide state-of-the-art performance in terms of rejecting undesired signals generated on adjacent frequencies, especially when compared to receivers designed for commercial mobile services and GPS reception. While Sirius XM continues to examine advanced front-end radio designs, no easy technology fixes exist to fully mitigate the interference that Sirius XM subscribers will experience if mobile WCS services become a reality. Finally, Sirius XM reminded the staff that the potential deployment of any improved satellite radio receiver technology would be subject to the long product cycles of the automotive industry (including the lengthy lead-time before OEM equipment is updated and the typical lifetime of an OEM radio after manufacture) and this must be a consideration in any discussion of technology evolution.

² See *e.g.*, Letter from Thomas Gutierrez, Counsel for GoGo, Inc., to Marlene H. Dortch, Secretary, Federal Communications Commission, WT Docket No. 07-293, (filed January 13, 2012).



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Please let me know if there are any questions about this submission.

Sincerely,

/s/ Michael A. Lewis

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Electronic CC: FCC Meeting Participants