

Before the
Federal Communications Commission
Washington, D.C. 20554

In the Matter of)
)
Amendment of Parts 0, 1, 2, and 15 of the)
Commission's Rules regarding)
Authorization)
of Radiofrequency Equipment)
) ET Docket No. 13-44
) RM-11652
Amendment of Part 68 regarding)
Approval of Terminal Equipment by)
Telecommunications)
Certification Bodies)

COMMENTS

Sirius XM Radio Inc. ("Sirius XM") hereby submits these comments in response to the Commission's *Notice of Proposed Rulemaking* in the above-captioned proceeding.¹ Sirius XM supports the Commission's proposal to incorporate ANSI C63.10-2009, *American National Standard for Testing Unlicensed Wireless Devices* ("ANSI C63.10-2009") into the Commission's rules for use in the measurement of intentional radiators.² Adopting this industry consensus standard will promote compliance with the Part 15 rules and decrease the burdens imposed on equipment manufacturers by certain outdated test procedures required for unlicensed devices.

¹ See Amendment of Parts 0,1, 2, and 15 of the Commission's Rules regarding Authorization of Radiofrequency Equipment and Amendment of Part 68 regarding Approval of Terminal Equipment by Telecommunications Certification Bodies, ET Docket No. 13-44, RM-11652, *Notice of Proposed Rulemaking* (rel. February 15, 2013) ("*Notice*").

² American National Standards Institute, Inc. Accredited Standards Committee C63, ANSI C63.10-2009 *American National Standard for Testing Unlicensed Wireless Devices*.

Consistent with the above, Sirius XM understands that ANSI C63.10-2013 -- an updated version of the ANSI C63.10-2009 standard -- is being finalized and will likely be adopted as an official ANSI standard within the next several months. Among other things, ANSI C63.10-2013 sets forth a new, comprehensive test standard for FM modulators used in vehicles.

Sirius XM holds numerous equipment certifications for aftermarket satellite radios with FM modulators that interface with vehicle AM/FM radios to provide Sirius XM programming to subscribers. The new ANSI C63.10-2013 standard is important to Sirius XM and other entities that manufacture, certify, or use devices relying on FM modulators to interface with car radios, because this standard provides a bench testing measurement procedure that can be performed quickly and economically in a test lab, rather than using vehicles on an open area test site.³ Assuming the Commission incorporates ANSI C63.10-2009 into its rules as proposed in the *Notice*, Sirius XM urges the Chief Engineer to take immediate steps to incorporate ANSI C63.10-2013 into its rules after ANSI completes the final balloting of ANSI C63.10-2013 and formally adopts this standard.⁴ A delay in incorporating updated ANSI standards into the Commission's rules could have a detrimental impact on equipment manufacturers, service providers and, ultimately, consumers.

³ Sirius XM recently received permission from the Commission to use a bench testing measurement procedure consistent with the current draft ANSI C63.10-2013 standard on an interim basis. See Office of Engineering and Technology Laboratory Division Knowledge Database, Inquiry Tracking Number 866596.

⁴ We note that the *Notice* proposes to grant the Office of Engineering and Technology delegated authority to update referenced standards in certain situations. See *Notice* at ¶69.

In conclusion, Sirius XM appreciates the opportunity to share its views on the ANSI C63.10 standard (including the updated 2013 standard) and urges the Commission to update the ANSI standards referenced within the Commission's rules.

Respectfully submitted,



James S. Blitz
Vice President, Regulatory Counsel
Sirius XM Radio Inc.
1500 Eckington Place, N.E.
Washington, DC 20002

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Terry G. Mahn
Jay S. Newman
Fish & Richardson P.C.
1425 K Street N.W.
Suite 1100
Washington, D.C. 20005
Counsel to Sirius XM Radio Inc.