

May 2, 2011

By Hand Delivery

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

FILED/ACCEPTED

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Federal Communications Commission
Office of the Secretary

**Re: Elite Electronic Engineering, Inc.
Request for Experimental Special Temporary Authority
File No. 0276-EX-ST-2011**

Dear Ms. Dortch:

Sirius XM Radio Inc. ("Sirius XM") hereby comments on the above-referenced application of Elite Electronic Engineering, Inc. ("Elite") requesting experimental special temporary authority ("STA") to conduct operations at various frequencies including in the 2.3 GHz band. Due to the need to prevent potential harmful interference to Sirius XM's operations, Elite should not be authorized to operate in spectrum assigned to Sirius XM.

Sirius XM is the licensee of Satellite Digital Audio Radio System ("SDARS") networks in the 2320-2332.5 MHz and 2332.5-2345 MHz band that provide a high-quality, continuous, multi-channel audio service throughout the United States. More than twenty million customers currently subscribe to Sirius XM's service.

Elite's STA request seeks authority to operate on numerous frequencies, including 2343.189 MHz, which is within the spectrum assigned to Sirius XM. Elite, however, has made no demonstration that its proposed co-channel operations on frequencies assigned to Sirius XM would not cause harmful interference to Sirius XM's operations. Furthermore, Elite has not justified its need for access to frequencies assigned to Sirius XM in order to conduct its proposed testing. Accordingly, Sirius XM requests that the Sirius XM frequencies be excluded from any grant of the Elite STA request.¹

¹ Sirius XM's request is consistent with action by OET in other experimental proceedings. See, e.g., BAE Systems Information and Electronic Systems Integration Inc., Call Sign WD2XJW, File No. 0085-EX-RR-2009, granted effective July 1, 2009 (authorizing experimental operations in the 1215-2700 MHz frequency range but specifying that no operations are permitted in the 2320-2345 MHz band in order to protect SDARS).

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If there are any questions regarding this matter, please contact the undersigned.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read 'K. A. Hastings', with a stylized flourish at the end.

Karis A. Hastings
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cc: James Burtie, FCC
John Kennedy, FCC
Doug Young, FCC
Jose Trevino, FCC
Daniel Crowder, Elite Electronic Engineering, Inc. (decrowder@elitetest.com)