XM Satellite Radio Inc Additional Information
Provided in Response to ATCB Questions 1-9 dated June 7, 2007
FCC ID RS2SA10113A
June 12, 2007

1) The label appears to be placed underneath the battery of the device. According to FCC requirements, please explain how the device meets with the following:

As an option to placing the FCC label on the exterior of the device, the FCC label can be placed in a user accessible area if the following conditions are met.

1) The device is handheld.
2) The FCC identifier is visible at the time of purchase. Marketing the device without the battery installed when the label is in the battery compartment is acceptable. The FCC identifier on the box or additional documentation directing the user as to where to find the FCC label also satisfies this requirement.
3) The user accessible area must not require any special tools for access and the FCC label must not be placed on a removable part.
4) The FCC identifier, model no. or FCC logo must be on the label and must meet all general labeling requirements or policies that apply for Certification, Verification or DOC; e.g. for Certification, for handheld devices, the identifier must go on the label but the two part warning statement in Section 15.19(a)3 can go in the manual.

A1) The XM MyFi device satisfies the conditions based on the following:

1) The MyFi is designed to be used as a handheld device.
2) The device is packaged and sold without the battery installed.
3) The user accessible area does not require any special tools for access and the FCC label is placed on a fixed part of the device (not removable part).
4) The FCC identifier and model no. are on the label and the two part warning statement is provided in the User Manual sold with the product.

2) For portable configurations, was the device tested in 3 axis and worse case measurements reported?

A2) The EUT was tested in 3 orthogonal planes and worse case measurements were reported.

3) At first impression, the bandwidth appeared to be peak. However it is noted that an average detector was used. Use of an average detector is unusual and therefore we have placed a generic inquiry into the FCC and IC regarding the validity of this method. Depending on the response, this method may or may not be found as acceptable.

A3) Noted.

4) 731 and IC form suggest operation from 88.1 – 107.9 MHz. Please adjust to cite 88.1 – 88.9 and 106.7 – 107.9.

A4) 731 and IC forms have been adjusted with these changes and have been uploaded as rev1.

5) FYI…Permit But Ask information has been submitted to the FCC.

A5) Noted.

6) FYI…It was noted in the IC report that all equipment has a 2 year cal cycle. My understanding is that 2 year calibration intervals are allowed for types of equipment which is rarely expected to change (i.e. LISN, Horn Antenna, etc.). While justifications can be made, it is unusual to see spectrum analyzers and amplifiers on a 2 year cycle. FAU may wish to investigate the validity of this with A2LA.

A6) Noted and the information has been sent to the FAU for further investigation.

8) FYI….Regarding short term confidentiality, you are responsible for the following:

a) Note that any documents held under the short-term confidentiality will automatically become public after 45 days. A manufacturer may extend this period up to an additional 45 days. This requires an additional cover letter requesting this extension must be submitted to ATCB a minimum of 7 days prior to the expiration of the original 45 day temporary grant of confidentiality

b) If the manufacturer engages in public marketing activities or otherwise publicizes the device prior to the expiration of the short-term confidentiality period, the applicant must immediately notify ATCB so the exhibits can be made publicly available.

A8) Noted.

9) FYI…..We have submitted the required information to the FCC through their "Permit But Ask" Procedure. We are awaiting their ok to continue processing the application or for any questions they may have.

A9) Noted.