



January 20, 2026

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Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
45 L Street, NW
Washington, DC 20554

**Re: Sirius XM Written *Ex Parte* Presentation
GN Docket No. 13-111, Promoting Technological Solutions to
Combat Contraband Wireless Device Use in Correctional
Facilities**

Dear Ms. Dortch:

Sirius XM Radio LLC (“Sirius XM”) files this letter in response to the *Third Further Notice of Proposed Rulemaking* in the above referenced proceeding,¹ in which the Commission seeks comment on the potential authorization of radio frequency (“RF”) jamming solutions in correctional facilities to counter the use of contraband devices. Sirius XM recognizes the public safety dangers that can result from the use of contraband devices by inmates in correctional facilities, but the use of jammers would pose its own public safety risks. Sirius XM joins with those commenters urging the Commission to prioritize solutions that are effective in eliminating the use of contraband devices but will not risk causing interference to terrestrial and satellite communications services operating in or around correctional facilities.

Sirius XM’s Interest

Sirius XM is the leading audio entertainment company in North America with a portfolio of audio businesses including its flagship subscription satellite radio service in the Satellite Digital Audio Radio Service (“SDARS”) band, offering commercial-free music, live sports, news, talk shows, and podcasts. SDARS operates in the 2320-2345 MHz band, and Sirius XM is also the holder of the adjacent band Wireless Communications Service (“WCS”) licenses in the C Block (2315-2320 MHz) and D Block (2345-2350 MHz). The WCS C Block and D Block are in turn adjacent to other WCS spectrum blocks used by AT&T for commercial mobile radio service.

As an SDARS provider, Sirius XM is a participant in the Emergency Alert System (“EAS”) administered by the FCC² and is the only satellite entity that has been designated as an EAS

¹ *Promoting Technological Solutions to Combat Contraband Wireless Device Use in Correctional Facilities*, Third Further Notice of Proposed Rulemaking, FCC 25-65 (rel. Sept. 30, 2025) (“Third FNPRM”).

² 47 C.F.R. § 11.2(b).

Primary Entry Point station. Sirius XM also uses its satellite radio service to provide weather updates and other safety-related information to all satellite radios in operation – including radios that are not currently subscribed to Sirius XM – assisting in the aftermath of major disasters such as hurricanes, earthquakes, and forest fires. In addition, Sirius XM provides a satellite-delivered public safety service to FEMA using the WCS spectrum and is actively marketing similar emergency communications services to other entities in the public safety community.

Discussion

As a provider of licensed radio services used by both commercial subscribers and public safety entities, Sirius XM is concerned about proposals that would adversely affect reception of its services.

In this regard, Sirius XM supports the comments of AT&T Services, Inc. (“AT&T”),³ opposing the use of jammers as a form of contraband interdiction unless there is irrefutable evidence that they can be used without adversely impacting legitimate wireless communications.⁴ This concern is particularly important for the licensed SDARS and WCS services that Sirius XM provides, which operate with technical limitations and interference risks because those services share the 2.3 GHz band with other licensed communications services. The Commission has long recognized the challenges faced by SDARS and WCS licensees, adopting a regulatory scheme balancing the needs of those licensees by requiring close coordination between band users.⁵

Adding jamming signals to the mix would significantly upset that balance. As AT&T explained, the Third FNPRM rests on the flawed assumption that jammers can block unlawful communications without impacting lawful communications.⁶ They cannot. Because jamming devices jam signals indiscriminately, the Third FNPRM’s proposal would, if adopted, jeopardize connectivity by guards, first responders, and law-abiding citizens in and near correctional facilities, including those using devices relying on the 2.3 GHz band.⁷

³ Comments of AT&T Services, Inc., GN Docket No. 13-111, at 2 (Dec. 29, 2025) (“AT&T Initial Comments”); Reply Comments of AT&T Services, Inc., GN Docket No. 13-111, at 1-2 (Jan. 12, 2026).

⁴ See also Comments of CTIA, GN Docket No. 13-111, at 3-4 (Dec. 29, 2025).

⁵ *Amendment of Part 27 of the Commission's Rules to Govern the Operation of Wireless Communications Services in the 2.3 GHz Band*, Report and Order and Second Report and Order, 25 FCC Rcd 11710 (2010); *Amendment of Part 27 of the Commission's Rules to Govern the Operation of Wireless Communications Services in the 2.3 GHz Band*, Order on Reconsideration, 27 FCC Rcd 13651 (2012). AT&T continues to hold licenses in the WCS A Block and B Block. The 2.3 GHz services of Sirius XM and AT&T can co-exist only due to the parties’ continuing coordination efforts.

⁶ AT&T Initial Comments, 2.

⁷ See Reply Comments of the Association of Public-Safety Communications Officials, International (“APCO”), GN Docket No. 13-111, at 2 (Jan. 12, 2026) (“because correctional facilities are often located near residences, businesses, roads, and other public areas, intentional signal interference can extend beyond correctional facility walls and disrupt lawful wireless communications by individuals or entities, potentially blocking 9-1-1 calls or delaying emergency assistance”).

Jammers have been shown to cause interference outside the facilities in which they are located, increasing the risk that wireless users living or traveling nearby will be impacted.⁸ In the context of satellite transmissions in the 2.3 GHz band which are highly susceptible to interference from terrestrial uses, that risk is significantly exacerbated. Thus, jammers could completely disrupt Sirius XM’s SDARS subscription audio services, FEMA uses, weather emergency reports, and EAS alerts, as well as wireless operators’ 911 access, Wireless Emergency Alerts (“WEA”), and other wireless-enabled services that are designed to keep the public safe.

As the Satellite Industry Association (“SIA”) observes, “[i]nterfering signals, even when present at power levels lower than the desired signal power level, can have a major impact on receiver performance” well outside of the area in which the interfering signals transmit.⁹ As SIA further explains, “[b]ecause satellite earth station receivers” – which include Sirius XM’s SDARS and WCS receivers – “must ‘hear’ signals that originate hundreds or thousands of kilometers above the Earth, satellite services are particularly susceptible to co- and adjacent channel interference from terrestrial jamming devices.”¹⁰ Sirius XM has made similar arguments in numerous Commission proceedings, explaining the interference risks caused to its satellite services by the aggregation of transmissions from multiple terrestrial sources.¹¹

For these reasons, Sirius XM supports AT&T’s and SIA’s respective calls for the FCC to adopt non-RF jamming solutions to address the very real issue of contraband devices in prisons.

Please address any questions regarding these matters to the undersigned.

Respectfully submitted,

/s/ James S. Blitz

James S. Blitz

Senior Vice President, Regulatory Counsel

⁸ AT&T Initial Comments, at 7.

⁹ Comments of the Satellite Industry Association, GN Docket No. 13-111, at 2 (Dec. 26, 2025).

¹⁰ *Id.* at 3.

¹¹ *See e.g.*, Reply Comments of Sirius XM Radio Inc., ET Docket No. 18-295, GN Docket No. 17-183, at 7 (Apr. 26, 2024) (“Transmissions from [6 GHz] devices located anywhere in CONUS will be received and magnified by SDARS space station antennas, adding to the noise levels from existing sources, all of which will aggregate to pose a direct and concrete threat to SDARS service quality and continuity.”), <https://www.fcc.gov/ecfs/document/104262819900190/1>.