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5-3527-EX-1998  
ORIGINAL  
6260-6319  
6259-98  
50/kw OK on 5/14

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September 17, 1998

FACSIMILE  
(202) 429-7049

Federal Communications Commission  
Experimental Radio Services  
P.O. Box 358320  
Pittsburgh, PA 15251-5320

Re: **Satellite CD Radio, Inc.**  
**Request for Special Temporary Authority**

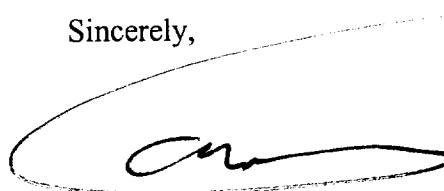
To the Commission:

On behalf of Satellite CD Radio, Inc., transmitted herewith is a request for Special Temporary Authority to conduct experimental operations beginning September 22, 1998.

Also enclosed is a check for \$45.00 to cover the filing fee (Fee Type Code "EAE"), along with a completed FCC Form 159.

Should you have questions concerning this matter, please call me at (202) 429-7269 or our engineering consultant Tom Dombrowsky at (202) 429-7236.

Sincerely,



Carl R. Frank  
Counsel for Satellite CD Radio, Inc.

Enclosures: Request for special temporary authority

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**Satellite CD Radio, Inc.**  
2175 K Street, NW  
6<sup>th</sup> Floor  
Washington, DC 20037  
Telephone: (202) 296-6840

Federal Communications Commission  
Experimental Radio Services  
P.O. Box 358320  
Pittsburgh, PA 15251-5320

**Re: Request for a Special Temporary Authorization**

To the Commission:

Satellite CD Radio, Inc., hereby requests Special Temporary Authorization ("STA"), beginning September 22, 1998, to test S-band terrestrial repeater ground stations for its satellite Digital Audio Radio Service (DARS) system, as described below.

In accordance with Section 5.56 of the Commission's Rules, the following information is provided in support of this request:

**1) Name and Address of the Applicant:**

Satellite CD Radio, Inc.  
2175 K Street, NW  
6<sup>th</sup> Floor  
Washington, DC 20037  
Telephone: (202) 296-6840

**Technical Contact:**

Robert D. Briskman  
President  
Satellite CD Radio, Inc.  
2175 K Street, NW  
6<sup>th</sup> Floor  
Washington, DC 20037  
Telephone: (202) 296-6840

**2) Need for Special Action:**

CD Radio currently has five pending applications on file at the Commission for regular Experimental Radio licenses for the proposed experimentation. See File Nos. 6259 through 6263-EX-

PL-1998. The agency has not yet been able to act on these applications, however. Accordingly, CD Radio seeks an STA for three of these locations so that it may commence its experimental operations. CD Radio has an urgent need to begin system testing to determine information about power levels required to ensure satellite DARS reception in urban "canyons" and near other obstacles and also measurement of out-of-band emissions. The Commission currently has a pending Notice of Proposed Rule Making concerning terrestrial repeaters in the DARS band and these tests should provide raw data to supplement the record concerning out-of-band emissions. Without immediate experimental authority, CD Radio would not be able to provide such technical data in a timely manner.

3) **Type of Operation:**

Continuous.

4) **Purpose of Operation:**

To measure objective (e.g., signal strength, delay spread, multipath, etc.) and subjective (e.g., music quality) transmission performance using parameter values of operational system. Specifically, CD Radio intends to measure:

- a) terrestrial transmission performance at S-band in its licensed spectrum; and
- b) severe urban environment effects on the system (San Francisco is a particularly difficult propagation environment).

5) **Dates of Operation:**

September 22, 1998, to December 22, 1998 or until experimental authority is granted.

6) **Class of Station:**

Experimental.

7) **Location of Operation:**

The three initial base stations will be located at the following sites:

Grizzly Peak Blvd  
Berkeley, Contra Costa County, CA  
37-52-56 N, 122-13-58 W

1 La Avanzada Street  
San Francisco, San Francisco County, CA  
37-45-20 N, 122-27-05 W

700 Radio Road

Brisbane, San Mateo County, CA  
37-41-12 N, 122-26-03 W

Mobile measurement vehicles are receive-only.

**8) Equipment to be Used:**

To obtain accurate coverage data, CD Radio must employ a sufficient number of base stations during its studies to simulate actual usage. It will be able to complete such studies at the three base station sites immediately but will require all five base station sites for final confirmation. The base units will be installed at the three locations identified above and will operate at 50 kW ERP. The antennas used for this system are directional, with a beamwidth of 120 degrees.

CD Radio recognizes that the operation of any unapproved device under experimentation must not cause harmful interference to authorized facilities. Should interference occur, CD Radio will take reasonable steps to resolve the interference, including if necessary arranging for the discontinuance of operation. However, as the licensee for the proposed band, interference is not expected.

**9) Frequencies Desired:**

2326.1 MHz  $\pm$  2 MHz for all base station operations

**10) Maximum Power:**

The base stations will operate at a power output not greater than 1000 W and an ERP not greater than 50 kW.

**11) Type of Emission:**

The primary emission designator will be 1M50M7E. Other emission modes may be utilized, but in no event will the emissions extend beyond the frequencies set forth under Item 9.

**12) Overall Heights of Antennas Above Ground:**

CD Radio will comply with all FCC and FAA antenna requirements. The antennas will be mounted either: (1) not higher than 20 feet above ground or 20 feet above a building; (2) on an FAA-approved structure in a manner that will not exceed the approved height (e.g., side mounted below the approved height); or (3) in a manner that does not require FAA approval.

13) **47 C.F.R. § 1.2002 Certification:**

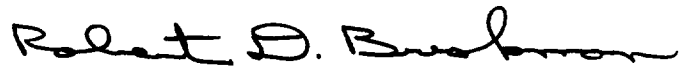
Applicant hereby certifies that it, its officers and directors, and any party with five percent or greater interest in this request for special temporary authorization is not subject to a denial of the Federal benefits requested herein pursuant to Section 5301 of the Anti Drug Abuse Act of 1988, 21 U.S.C. § 862.

CD Radio submits that issuance of an STA is in the public interest, convenience, and necessity as it will permit CD Radio to simulate real-world operation of its services and provide needed technical data in support of Commission rule making activities.

Enclosed is a check for \$45.00 to cover the filing fee (Fee Type Code "EAE"), along with a completed Form 159.

Should you have questions, please call our FCC counsel Carl Frank or engineering consultant Tom Dombrowsky of Wiley, Rein & Fielding at (202) 429-7000.

Respectfully submitted,



Robert D. Briskman  
President  
Satellite CD Radio, Inc.

Date: Sept. 16, 1998