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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

Federal Communications Commission
Office of the Secretary

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Domestic Facilities Division
Satellite Radio Branch

In the Matter of)
the Application of)
SATELLITE CD RADIO, INC.)
For Authority to Construct,)
Launch and Operate Space)
Stations in the Satellite)
Sound Broadcasting Service)

File Nos. 49/50-DSS-P/LA-90,
58/59-DSS-AMEND-90

To: The Commission

COMMENTS OF
COMMUNICATIONS SATELLITE CORPORATION

Communications Satellite Corporation ("COMSAT") hereby submits its comments concerning the above-captioned application submitted by Satellite CD Radio, Inc. ("CD Radio").

COMSAT has no general disagreement with the service proposed by CD Radio, or with most of the matters proposed in its application. However, COMSAT objects strongly to CD Radio's request that the Commission authorize it to utilize the frequency band from 1470 to 1530 MHz for satellite CD radio

services, and has previously opposed CD Radio's petition for rulemaking asking the Commission to reallocate the 1460 to 1530 MHz band for CD-quality radio services.^{1/}

COMSAT recently filed in GEN Docket No. 90-357 comments addressing the spectrum allocation issues raised by the Commission's Notice of Inquiry in that proceeding.^{2/} As shown in those comments, which COMSAT hereby incorporates by reference, as well as in COMSAT's filings in RM-7400, the frequency band sought by CD Radio is particularly well suited to meet critical mobile-satellite safety and business service needs that are of greater significance than the incremental improvement in radio listening quality and coverage that digital audio radio services could provide. COMSAT therefore

^{1/} Opposition of Communications Satellite Corporation to Petition for Rulemaking, RM-7400 (Aug. 20, 1990); see also Reply Comments of Communications Satellite Corporation, RM-7400 (Sept. 4, 1990). In its reply comments, CD Radio agreed that COMSAT's request for reallocation of the 1525 to 1530 MHz band for mobile-satellite services has merit, and therefore shifted its requested frequencies to the 1465 to 1525 MHz band. Reply Comments and Response of Satellite CD Radio, Inc., RM-7400 (Sept. 14, 1990). While that change is welcome, it does not alter COMSAT's opposition to CD Radio's allocation request.

^{2/} Comments of Communications Satellite Corporation, Amendment of the Commission's Rules with Regard to Establishment and Regulation of New Digital Audio Radio Services, GEN Docket No. 90-357 (Nov. 13, 1990).

urges the Commission not to consider CD Radio's frequency allocation request in isolation, but instead to consider it in conjunction with the pressing need for additional frequency spectrum to meet the fast-growing demand for mobile-satellite services.

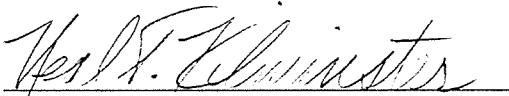
The Commission itself in its Second Notice of Inquiry concerning WARC-92 preparations recently proposed reallocating the 1525-1530 MHz subband for mobile-satellite services and acknowledged the need for substantial additional allocations for those services.^{3/} And the Commission in GEN Docket No. 90-357 is considering alternative allocations for digital audio radio services. COMSAT submits that it would be premature and precipitous for the Commission to consider CD Radio's frequency request before it concludes those other proceedings.

^{3/} Second Notice of Inquiry, An Inquiry Relating to Preparation for the International Telecommunication Union World Administrative Radio Conference for Dealing with Frequency Allocations in Certain Parts of the Spectrum, Gen. Docket No. 89-554, at ¶¶ 65-73 (Oct. 1, 1990).

For the foregoing reasons, the Commission should refuse to consider CD Radio's frequency authorization request in isolation. It should instead consider that request in conjunction with the recognized need for additional frequency spectrum to meet growing demand for mobile-satellite services, and the particular appropriateness of L-band spectrum to meet that need.

Respectfully submitted,

COMMUNICATIONS SATELLITE CORPORATION

By 
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November 30, 1990

CERTIFICATE OF SERVICE

I, Neal T. Kilminster, hereby certify that I have this day caused a true and correct copy of the foregoing Comments of Communications Satellite Corporation to be served, by first class mail, postage prepaid, on the parties listed below:

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Neal T. Kilminster

November 30, 1990