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AMERICAN BOAT AND YACHT COUNCIL

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OFFICE OF CHIEF
DOMESTIC FACILITIES DIVISION
COMMON CARRIER BUREAU

FCC MAIL BRANCH

November 9, 1992

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Federal Communications Commission
1919 "M" Street NW
Washington DC 20554

ATTN: Office of the Secretary

REF: FCC File #44/45-DSS-AMEND-92

To The Commission:

The American Boat & Yacht Council is a tax-exempt membership organization with 2300 members who are naval architects, marine surveyors, boat manufacturers and the public. Our members are involved in the manufacture, use and inspection of boats used by the public in recreational pursuits. We are located in Edgewater, Maryland. Our membership is nationwide.

Boats belonging to our members and boats supplied by our members for sale to the public are used in both coastal and inland waters. In coastal waters, they generally are limited to distances of approximately 100 miles from shore. In inland waters, they navigate all of the rivers, lakes and impoundments in the U.S. In many of these areas, the reception of audio radio for entertainment, weather reports and other use for information is limited by static and low signal strength. This is caused by the distance involved in the case of near-coastal service and is limited by the terrain surrounding most inland waterways. In remote areas of the United States, even though there may be one or two local stations which can be received, the programming choices are limited and often do not suit the taste of the listeners on these boats.

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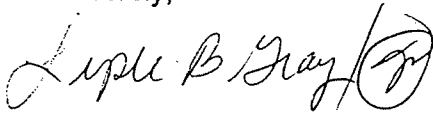
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Letter to Federal Communications Commission
November 9, 1992
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It appears to us that the digital audio radio services as proposed in this application, being able to supply programming on 30 different channels would supply the diversity necessary to please the entire spectrum of persons who use boats on U.S. waters. It should be noted that the average income of boat owners in the United States is approximately \$25,000 per year. They are predominantly middle-class persons working for wages. The latest Coast Guard statistics indicate that there are more than 11 million boats registered in the United States. They have estimated that approximately 60 million persons go boating at some time during each calendar year. That is nearly one-fourth of the population.

Sincerely,

A handwritten signature in cursive script that reads "Lysle B. Gray" followed by a circular flourish or initial.

Lysle B. Gray
Executive Director

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