

APS&E

ALL PRO SPORTS AND ENTERTAINMENT, INC.

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November 9, 1992

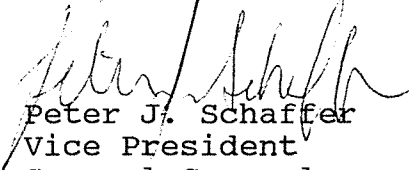
Federal Communications Commission
1919 M Street, NW
Washington, D.C. 20554

Attention: Office of the Secretary

Dear Secretary:

Enclosed please find an original and nine (9) copies of comments in support of application 44/45-DSS-AMEND-92 from ALL PRO SPORTS & ENTERTAINMENT, INC.

Sincerely,
ALL PRO SPORTS & ENTERTAINMENT


Peter J. Schaffer
Vice President
General Counsel

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

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In the matter of)	
the Application of)	
)	
SATELLITE CD RADIO, INC.)	File Nos. 49/50-DSS-P/LA-90,
)	58/59-DSS-AMEND 90,
For Authority to Construct, Launch)	44/45-DSS-AMEND-92
and Operate Space Stations for)	
the Provision of Digital Audio)	
Radio Services)	

TO: The Commission

**COMMENTS OF ALL PRO SPORTS AND ENTERTAINMENT, INC.
IN SUPPORT OF APPLICATION 44/45-DSS-AMEND-92**

All Pro Sports and Entertainment, Inc. (APSE) is a multidisciplinary firm which focuses on the representation of professional athletes and entertainers. Areas of expertise and representation include: law and contracts, financial planning, accounting, and marketing. Clients include Barry Sanders of the Detroit Lions, David Tate of the Chicago Bears, and Mark Jackson and Steve Atwater of the Denver Broncos. APSE maintains offices in Denver, Colorado and Beverly Hills, California. APSE feels confident in commenting on the aforementioned Application and believes the granting of said Application is in the public interest for the following reasons:

1.) The Satellite CD Radio, Inc. (SCDR) Application proposes a system for the delivery of thirty channels of uninterrupted, commercial free audio programming via satellite to automobiles and fixed locations on a per subscriber, non-broadcast basis. The direct from satellite delivery of the SCDR programming leaves it unencumbered by the coverage area considerations of traditional terrestrial broadcasting. These considerations make it impossible for many people in the United States to receive the same level of diversity in programming options as do those in urban areas. The SCDR system is a benefit to those people who choose or are forced to live in areas less saturated by traditional broadcast mediums. The SCDR system will allow more prolific coverage of entertainment programming or sports events than is now possible. This will allow more people in more parts of the country to experience greater opportunities to maintain contact with their particular areas of interest and enjoyment.

2.) The SCDR system will promote competition for the subscribers through the ability to incorporate additional systems into the 2310-2360 MHz frequency band. This competition will spur developments which are beneficial to consumers through the competing Digital Audio Radio Systems (DARS) attempts to achieve product differentiation. These attempts to product differentiate will lead to greater market satisfaction and the satisfaction of the new demands of additional markets. This is necessary to the advancement which ultimately brings out the best products. APSE knows the sports and entertainment markets and believes that the SCDR system described in the Application will satisfy the initial demands of these markets and that competitive pressures will forever necessitate the

satisfaction of these markets. This will provide additional outlets for sports and entertainment programming.

3.) The ability of the SCDR system as proposed in the Application to provide additional outlets for sports and entertainment programming generates opportunities for new programming origination. This will create the opportunity for the creation of jobs from field level or stage level programming pick-up to studio manipulation to satellite transmission. The ability to create jobs in the sports and entertainment industries is not just advantageous to those industries. It also has necessary corollaries in associated industries. The result is an increase in employment possibilities across a wide range of disciplines and the requisite skill transference which follows and which creates a more highly skilled and employable work force.

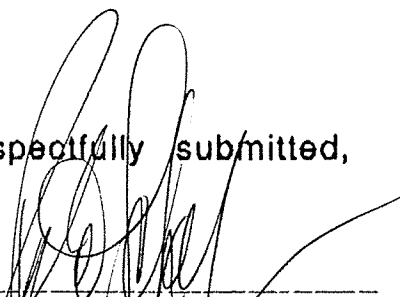
4.) The SCDR system as proposed in the Application will deliver this increased level and diversity of programming to a greater number of people with a quality of fidelity that consumers presently demand. Consumers desire the same level of fidelity from sports and entertainment programming as they do from digital audio recordings. This increase in expectations is in lock-step with the general trend toward the "Home Theater" whereby consumers attempt to achieve the sensations of a live performance through enhancements to fidelity. To extend this "Home Theater" concept incorporating narrowcast and niche programming to the automobile is desirable and demanded by consumers.

CONCLUSION

The Application of SCDR should be granted by the Federal Communications Commission. The benefits of the SCDR system are the same as the expectations of consumers. The system will serve underserved people

by giving them the same choices available to only portions of the population. The operation of the SCDR system has the potential to create jobs and elevate the qualifications of some part of the work force.

November 12, 1992

Respectfully submitted,


Mr. Peter J. Schaffer
Vice President
General Counsel
All Pro Sports and Entertainment
1999 Broadway
Denver, CO 80202

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