

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

NOV 2 1992

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)	

**COMMENTS OF WPFW IN SUPPORT OF THE
APPLICATION OF SATELLITE CD RADIO, INC.**

WPFW is an independent radio station with offices located in Washington, D.C. WPFW serves the metropolitan Washington, D.C. area. WPFW has followed the progress of Satellite CD Radio, Inc. and has participated in a demonstration in 1991 of the Satellite CD Radio system. This demonstration was an end-to-end test to determine the feasibility of providing digital audio transmission and associated customer service functions as described in the Application. Through this association WPFW feels confident in its ability to comment favorably on the Application.

WPFW believes that the provision of Digital Audio Radio Services as described in the Application is both feasible and desirable. The feasibility of the framework of the Satellite CD Radio system was

proven in the demonstration. This framework encompassed the major aspects of the proposed system. These aspects were: program origination; coding, modulation and uplink; downlink to a consumer receiver, decoding and demodulation and; a representative procedure for consumer subscription to the service. The success of this demonstration has proven to WPFW that it is feasible to build and operate a system which provides digital audio programming to consumers by subscription and following the system architecture and logic as proposed by Satellite CD Radio.

WPFW also believes that the digital audio service that Satellite CD Radio wishes to provide is desired by consumers for three reasons. The first reason that consumers desire the service is that it will allow them to receive the same programming choices anywhere in the continental United States. This is important to those people that do not presently have the wide range of programming choices which are available to listeners in urban areas. Consumers who live in remote or less densely populated areas and do not have the wide range of programming available to city dwellers would be able to enjoy the entertainment, niche, and educational programming to be provided by the Satellite CD Radio system. This will bring the programming options of all people across the United States into parity.

The second reason that the Satellite CD Radio system is desirable from a radio listener's perspective is the ability to receive digital signals of very high quality. This brings the consumers the type of audio quality they have come to expect. This expectation has been driven by the proliferation of Compact Disks for home and car entertainment. The realization of this expectation has led to the use of Compact Disks by

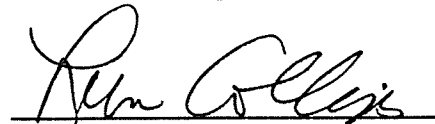
many radio stations for over the air play. This is all in response to the desire of consumers for greater fidelity from audio sources. The Satellite CD Radio system satisfies these desires of consumers.

The third reason that the Satellite CD Radio system is desirable is that its development and establishment will foster continuing development and growth in the audio broadcast industry. This development will be in the form of advancements to terrestrial broadcast technology. The results of these advancements will be to increase the capabilities of the terrestrial broadcast infrastructure, allow that infrastructure to capitalize on the ability to offer an increased level and number of services and, contribute to United States technological superiority.

For these reasons the Federal Communications Commission should look favorably on the Application of Satellite CD Radio, Inc. The development of Digital Audio Radio Services is necessary for the satisfaction of consumer desires and the growth of the audio programming and distribution industry. The system as proposed by Satellite CD Radio can fulfill these goals as was evidenced by WPFW in the successful demonstration.

November 10, 1992

Respectfully submitted,



Mr. Leon Collins
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202-783-3100

JAZZ AND MUCH, MUCH MORE!
WPFW 89.3 FM

November 10, 1992

Federal Communications Commission
1919 M Street, N.W.
Washington, D.C.
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Attention: Office of the Secretary

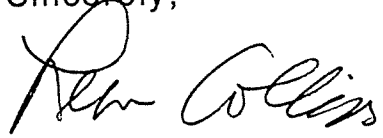
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Dear Secretary:

OFFICE OF THE SECRETARY
FEDERAL COMMUNICATIONS COMMISSION

Enclosed please find an original and nine copies of the comments of WPFW FM in support of the application of Satellite CD Radio, FCC File No. 44/45-DSS-AMEND-92.

Sincerely,



Leon Collins
General Manager

Enclosure