NEW WORLD SKY MEDIA 553 South Street, #312 Glendale, CA 91202 RECEIVED

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Federal Communications Commission
Office of the Secretary

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November 9, 1992

FEDERAL COMMUNICATIONS COMMISSION 1919 M Street NW Washington, D.C. 20554

Attn:

Office of the Secretary

Dear Secretary:

Enclosed please find the original and nine (9) copies of the comments of New World Sky Media in support of Application 44/45-DSS-AMEND-92.

Sincerely,

Bryan Kim President

BBK:jlc

Enc.

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

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Federal Communications Commission
Office of the Secretary

In the matter of the Application of

SATELLITE CD RADIO, INC.

For Authority to Construct,)
Launch and Operate Space)
Stations for the Provision)
of Digital Audio Radio Services)

File Nos. 49/50-DSS-P/LA-90 58/59-DSS-AMEND-90, 44/45-DSS-AMEND-92 RM-7400

To: The Commission

We are New World Sky Media, Inc. (NWSM) located at Glendale, California, organized to broadcast to the Korean Community in Korean language through Digital Audio Radio Service (DARS) working in conjunction with Satellite CD Radio, Inc. (SCDR).

It is imperative that the United States remains the pioneer and leader in DARS and any delays or opposition to its development and application should not be allowed. Time is critical in any new technological developments, therefore, the launching of the Satellite for S-Band should be done as soon as possible. It will open doors for U.S. DARS technology to once again promote a dominance in the world market and allow NWSM to begin serving Korean-Americans.

NWSM was organized with the following objectives:

- 1. By serving 1.3MM Korean-Americans currently residing in the U.S. with Korean language broadcast, preserving the Korean Cultural Heritage and promoting variety within U.S. culture.
- 2. Provide information in politics, economy, societal issues, culture, legal issues, and customs of the United States to

Korean-Americans for expansion in under-standing of the nation of U.S. and function as a guide to becoming closer to the main-line group of the U.S. thereby eliminating the misunderstandings which lead to strife.

- 3. By utilizing DARS, a uniform dissemination of information could be accomplished to anywhere in the U.S. including remote areas not previously served by present broadcast systems which would reach Korean-American enclaves isolated by language barriers..
- 4. By providing Broadcast Emergency Service to all parts of the nation in the Korean language, we would be able to alert promptly and serve public interest.

We support SCDR in that it presents a unique and innovative system. This system will promote U.S. competiveness through the further development of DARS, the evolution of the system and technical offshoots, and the ability of American businesses and consumers to contribute to and benefit from these developments. We believe the SCDR has stated many areas where American businesses could benefit, including satellite construction, satellite launch, manufacturing of equipment and installation. This means more jobs for United States citizens and would improve our current economic condition.

We agree with SCDR that the DARS system as proposed by SCDR in the Application permits the potential incorporation of modulation standards for digital audio broadcasting which have not yet been adopted. This flexibility is useful so that the satellite and terrestrial-DARS could have the greatest amount of compatibility. This inter-operability would allow the satellite and terrestrial

systems to be compatible from a modulation perspective. The result of such commonality is that consumer receivers will be less complicated and available for lower cost due to efficiencies of production. This is an importnt aspect of the SCDR Application since it does not necessitate the development and sale of receivers which are solely dedicated to satellite-DARS but which are, except for the antenna and interface, potentially usable with the modulation standards which are adopted and eployed by terrestrial digital broadcasting.

This element of the SCDR Application results in lower cost receivers for the consumer and compatibility with and augmentation of terrestrial digital broadcasting. The creation of these options by the flexibility inherent in the SCDR Application is beneficial to consumers, manufacturers, and programmers of DARS. It will allow more people to benefit from the SCDR DARS technology and from other DARS programmers.

Consumers have become familiar with digital sound through compact discs and they are aware of a vast difference between digital recording as compared to an analog system. We believe that U.S. consumers are ready for digital broadcasting systems and once DARS is initiated, it will be very welcome by most consumers.

Conclusion

Throughout history, mankind has consistantly strived for improvements in quality of living. More specifically, regarding communication technology, no single person, or country has ever been able to delay its development, and to oppose the development would be a step against the flow of history.

We believe that SCDR's proposed DARS system would serve public interest reducing the geographical and cultural differences with improved sound quality to the listners in the entire nation, not to mention the benefit of increased jobs. We hope the commission will approve SCDR's Application.

Sincerely,

Bryan B. Kim

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