

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

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MAIL BRANCH

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-DDS-P/LA-90
58/59-DDS AMEND-90
44/45-DDS-AMEND-92
RM-7400

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TO: The Commission

OFFICE OF CHIEF
DOMESTIC FACILITIES DIVISION
COMMUNICATIONS BUREAU

COMMENTS OF
THE RECREATION VEHICLE INDUSTRY ASSOCIATION

The Recreation Vehicle Industry Association (RVIA) is the national trade association representing nearly 500 manufacturers of recreation vehicles and their related suppliers. Its membership includes nearly 200 manufacturers that produce approximately 95 percent of all recreation vehicles (RVs) purchased in the United States.

RVIA supports the development of Digital Audio Radio Services (DARS) as proposed by Satellite CD Radio, Inc., (SCDR). It would provide digital CD-quality diverse programming to the 35 million occupants of more than 8 1/2 million recreation vehicles while they are vacationing in or travelling

through relatively remote areas that are presently underserved by traditional broadcast mediums.

The satellite DARS that would be provided by SCDR will assure that remote areas receive the same programming and quality of services as urban areas.

Moreover, this DARS permits the potential incorporation of modulation standards for digital audio broadcasting that have not yet been standardized. This flexibility will enable maximum compatibility with and augmentation of terrestrial digital broadcasting. As a result, the development and purchase of receivers that are solely dedicated to satellite-DARS will not be necessary and consumers' receivers will be less complicated and less costly. Except for antenna and interface, DARS is potentially usable with the modulation standards adopted and employed by terrestrial digital broadcasting.

The SCDR Application proposes thirty (30) channels of CD-quality audio programming that will be available 24 hours a day, uninterrupted and commercial free, anywhere in the continental United States to vehicles and fixed locations. The format of each channel will be directed to a narrowly defined audience taste so that all RV owners will be given a wide variety of selections from which to choose.

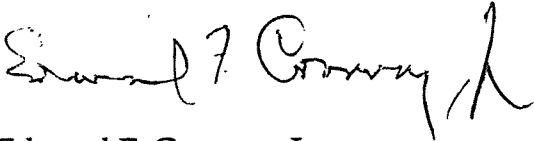
The SCDR Application also has the capability of overcoming other weaknesses in present broadcast technologies. Its patent pending invention utilizes two satellites with simultaneous transmission of the same thirty channels of CD-quality audio programming will inhibit multipath distortion through signal diversity.

In addition, the spatial diversity of its signal sources will prevent blockage by ensuring that each receiver in a recreation or other vehicle will be in direct line-of-sight of at least one signal source even while travelling through mountainous or other areas where there would otherwise be line-of-sight blockage.

RVIA Comments
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Accordingly, the Commission should find the Application of Satellite CD Radio, Inc. worthy of granting. The innovative combination of these attributes and inventions in the system proposed in the application will provide a unique and valuable service to consumers travelling in recreation and other vehicles and to consumers residing in remote areas.

Respectfully submitted,

A handwritten signature in cursive script, appearing to read "Edward F. Conway, Jr.", with a large, stylized flourish at the end.

Edward F. Conway, Jr.
Assistant General Counsel