

Before the NOV 1 3 1992 FEDERAL COMMUNICATIONS COMMISSION

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

TO: The Commission

COMMENTS OF HUGHES SPACE AND COMMUNICATIONS COMPANY

Washington, D. C. 20554

Hughes Space and Communications Company (HSC) is located in El Segundo, California. HSC is a preeminent supplier of commercial communication satellites in the world marketplace. Hughes is in favor of the SCDR application as it establishes the satellite as a unique and viable means for distributing audio programming with equally high quality to diverse geographical regions.

The SCDR application proposes a system which facilitates coordination with competing systems. The frequency plan would allow, for example, three other identical systems to operate simultaneously, thus providing the equivalent of 120 channels of CD quality radio.

The satellite design required to implement the SCDR system is a straightforward application of current technology. While DARS typically requires significant satellite resources in terms of power consumption, the proposed SCDR system design and patent pending invention reduces the required satellite size to a manageable level, well within the existing experience base.

Both spacecraft can be designed, manufactured, tested and delivered within a three year period. There are no technical risks or impediments foreseen that would preclude SCDR from launching and operating this system in a timely fashion.

Respecfully submitted,

H. J. Masoni

Manager, Advanced Programs
Hughes Space and Communications

cc: Rosalee Chiara