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Before the  
Federal Communications Commission  
Washington, D.C. 20554

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OFFICE OF CHIEF  
DOMESTIC FACILITIES DIVISION  
COMMUNICATIONS DIVISION

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 )

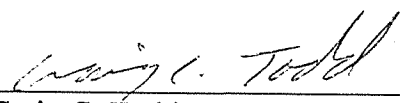
File Nos. 49/50-DSS-P/LA-90  
58/59-DSS-AMEND-90  
44/45-DSS-AMEND-92  
RM-7400

Dolby Laboratories is a world leader in the field of audio systems for both consumer and professional use. Our technology has been incorporated in over 400,000,000 consumer products. More than 3,600 films have been released in our **Dolby Stereo** format, and more than 18,000 theatres have acquired our equipment to reproduce these films. Dolby digital audio coding technology is in use in several satellite television systems, and is under consideration by the FCC Advisory Committee on Advanced Television Service for use in HDTV. We have actively followed developments in the field of digital audio broadcasting, and feel we have significant expertise in this area.

We believe the current broadcast technology for delivery of audio programming to consumers has serious deficiencies. Both AM and FM broadcast stations have very limited service areas where high quality audio may be received. Conversion of the terrestrial broadcast network to digital modulation techniques may allow uniformly high quality audio to be delivered to the entire service area of a terrestrial broadcaster. However, there will still be many areas of the country which will receive little or no broadcast audio service from terrestrial transmissions.

Dolby Laboratories has examined the pending application of Satellite CD Radio to construct a satellite delivered audio broadcast system. We believe a system like that proposed by Satellite CD Radio is feasible, and could be very successful. We are confident that it will be practical to build consumer satellite audio receivers at sufficiently low cost that a high volume market will develop. We encourage the commission to allocate spectrum for satellite delivery of audio to consumers, and to approve the construction of the necessary satellites.

Respectfully submitted,

  
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Craig C. Todd  
Senior Member of the Technical Staff  
Dolby Laboratories

November 11, 1992