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Federal Communications Commission
Office of the Secretary

November 12, 1992

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OFFICE OF CHIEF
DOMESTIC FACILITIES DIVISION
COMMUNICATIONS SERVICES

Federal Communications Commission
1919 M Street, NW
Washington, DC 20554

Attention: Office of the Secretary

Gentlemen:

Enclosed you will find the original and nine (9) copies of a brief comment we wish to submit in support of the Application of Satellite CD Radio, Inc. Thank you for your consideration.

Sincerely,

A handwritten signature in cursive script that reads "Douglas A. Heydon".

Douglas A. Heydon
President

Enclosures

cc: W. Doherty, SCDR

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Federal Communications Commission
Office of the Secretary

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

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)	RM-7400
the Provision of Digital Audio)	
Radio Services)	

TO: The Commission

**COMMENTS OF
ARIANESPACE, INC.**

Arianespace, Inc., with offices in Washington, D.C., is the U.S. subsidiary of Arianespace, S.A., Evry, France, a private commercial organization providing satellite launch services on a world-wide basis. Arianespace, Inc. serves the U.S. market for these launch services, and to date, this market has accounted for approximately 21% of total Arianespace contracts. The Ariane launch vehicles have launched a total of 32 U.S.-built satellites for both domestic U.S. and foreign customers, with 19 others in the current backlog. We are therefore quite familiar both with the U.S. manufacturers and with the operators of commercial satellites for a variety of services.

As a major service provider to the commercial communications satellite industry, we wish to offer comments in support of the Application of SATELLITE CD RADIO, INC. (SCDR). Our reasons for offering these comments include the following:

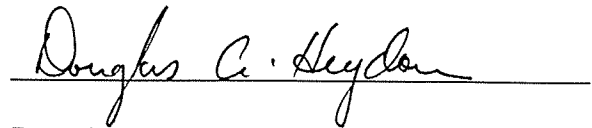
- Services that offer clear consumer benefits as a result of being satellite-based, e.g., direct-broadcast-type services to a wide geographic area permitting "niche" programming on a reasonable business basis, thereby making otherwise unprofitable services practicable, deserve to be encouraged;
- Arianespace fully supports any innovative application of satellite technology that offers the prospect of expanding the range of services provided;
- New services that offer the prospect of expanding the requirements for satellite launches are in the direct interest of Arianespace and other launch service providers;
- Arianespace has an established history of support and encouragement of new and innovative satellite-based ventures, e.g., PanAmSat, and wish to further encourage such ventures.

CONCLUSION

Arianespace anticipates entering into a Launch Reservation Agreement with SCDR in the near future, and believe that this, and other, factors offers substantive

evidence of both intent and ability to proceed with this worthwhile project in a reasonable and responsible fashion. We respectfully suggest that the Commission should act favorably on the SCDR Application.

Respectfully submitted,

A handwritten signature in cursive script, reading "Douglas A. Heydon", is written over a solid horizontal line.

Douglas A. Heydon

President

Arianespace, Inc.

November 12, 1992