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Charles F. Engel
Senior Vice President
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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

November 11, 1992

Federal Communications Commission
1919 M Street, N.W.
Washington, D.C. 20554

Attention: Office of the Secretary

Dear Sirs:

Enclosed please find an original and nine (9) copies of
comments in support of File No. 44/45.DSS AMEND 92.

Sincerely,

Charles F. Engel

Charles F. Engel
Senior Vice President

CFE:ljf

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

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NOV 12 1992

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the matter of)
the Application of)
SATELLITE CD RADIO, INC.) File Nos. 49/50-DSS-P/LA-90,
For Authority to Construct, Launch) 58/59-DSS-AMEND-90,
and Operate Space Stations for) 44/46-DSS-AMEND-92,
the Provision of Digital Audio) RM-7400
Radio Services)

TO: The Commission

**COMMENTS OF ROLLINS HUDIG HALL, INSURANCE BROKER,
IN SUPPORT OF THE APPLICATION OF SATELLITE CD RADIO, INC.**

Rollins Burdick Hunter, now re-titled as Rollins Hudig Hall, is a major United States based insurance broker. In past times, the AON group, as owners of Rollins Burdick Hunter, has acquired a large share-holding in Nicholson Chamberlain Collis in London, the whole share-holding in Frank B. Hall in the United States and Leslie & Godwin in London, and the whole share holding in Hudig-Langeveldt and its various subsidiaries in Holland and Germany. This total group is a pre-eminent insurance broker in many fields, including aviation, and is now embarked upon a major expansion of it space oriented activities, with a headquarters in Herndon, Virginia (13873 Park Center Road, Suite 201, Herndon, Virginia 22071).

As appointed broker to Satellite CD Radio Inc., Rollins Hudig Hall is convinced of the viability of the undertaking and wishes to add full support to this application.

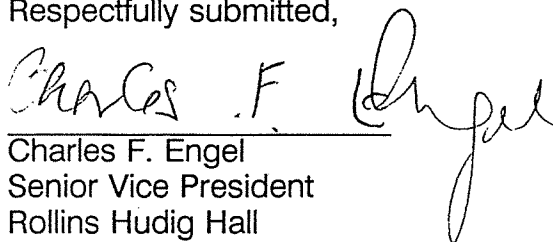
Satellite CD Radio intends to supply 30 channels of very high quality music to mobile receivers in the continental United States. This is the only application for provision of such a service in the world and as such is unique and will provide a showcase for United States technology. It will also break ground in the context of the technology of mobile receivers, allowing the integration of satellite delivered radio into multi-band mobile receivers, in a user friendly fashion. Satellite CD Radio has assembled a broad and noteworthy channel content listing, that in our belief ensures success. Jobs will be created and consumers will be served.

Rollins Hudig Hall has great confidence in the technical and commercial viability of the Satellite CD Radio program and has enlisted its very large resources in support of this unique new start.

RHH is convinced that the project, being financially viable and resting on a sound while innovative technical base, will be eminently insurable, thus providing further assurance of financial viability.

For these reasons the Commission should find the Application of Satellite CD Radio, Inc. worthy of granting. The innovative combination of these attributes and inventions makes the system proposed in the Application beneficial to the public interest through technology advancement and coverage of underserved areas.

Respectfully submitted,


Charles F. Engel
Senior Vice President
Rollins Hudig Hall

November 11, 1992

