



Office of
Robert L. Johnstone

November 12, 1992

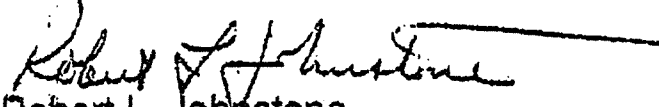
Federal Communications Commission
1919 M Street, NW
Washington, DC 20554

Attention: Office of Secretary

Dear Secretary:

Enclosed please find ten copies of comments to be filed in support of File No. 44/45-DSS-AMEND-92, (Satellite CD Radio, Inc.).

Sincerely,


Robert L. Johnstone
Dir. Strategic Marketing

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OFFICE OF CHIEF
DOMESTIC FACILITIES DIVISION
COMMON CARRIER BUREAU

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

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
J BOATS, INC.**

J Boats, Inc. is the leading builder of performance sailboats in the world with headquarters in Newport, Rhode Island. Its primary function is to design and market sailboats, ranging in size from the J/22 (22 feet) to the J/65 which are built under license in the United States, Japan, Australia, Argentina, Brazil, Italy, the UK and Slovenia and marketed in over 30 nations under the "J" trademark. More than 100,000 owners and crew (2/3s in the USA) actively sail its designs, designated by Fortune Magazine as one of the top 100 American product lines for the 1990's.

J Boats, Inc. is in the business of addressing recreational boater needs with innovative, advanced new product. As such it is representative of many firms addressing the marine market.

Digital Audio Radio Services represent a major breakthrough for marine use. The National Sporting Goods Association "Sports Participation Study" shows that there are 4.6 million sailors, 29.0 million motorboaters and 9.4

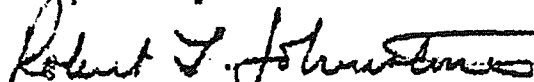
million canoeists in the United States - an unduplicated total of about 35 million people involved in water sports which are very often beyond the reach of quality reception or in a rough, wet environment not friendly to the family tape or CD disc library.

WHY DARS AS PROPOSED BY SATELLITE CD RADIO?

1. This service will permit millions of Americans to have access to quality radio when they can use it most and when other forms of audio entertainment/information are either inconvenient or non-existent - during recreational boating hours - and when travelling to remote boating areas.
2. The diversity of DARS commercial-free quality programming should increase radio listenership of all types, since the existence of DARS will ensure that radio receiving equipment (with AM/FM/DARS) is at hand.
3. The presence of radio receiving equipment is a safety matter where boating is concerned, in that on-coming hazardous weather warnings are more likely to be received or searched for if the sky is threatening.
4. The United States and the FCC should take a leadership role in spearheading this technology and commercialization of DARS, for there is enough interest in other countries to fill the vacuum if we don't.
5. The balance of payments and American jobs are once again at stake. If DARS gets mired down in debate and decisive action is not taken, we can expect to see more enlightened foreign countries pick up on the opportunity, then exploit a big export market in the U.S. when the FCC ultimately bows to international pressure 5-10 years from now.

For the above reasons the Commission should act favorably on the Satellite CD Radio Application.

Respectfully submitted



Robert L. Johnstone
Dir. Strategic Marketing
J Boats, Inc.

November 12, 1992