

INTERSTATE MEDIA

November 10, 1992

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

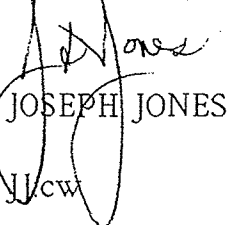
Re: COMMENTS: Digital AUDIO Radio Service Satellite System Application
File #49/50-DSS-P/LA-90, 58/59-DSS-AMEND-90, 44/45-DSS-AMEND-92

FEDERAL COMMUNICATIONS COMMISSION REPORT NUMBER DS-1244 ASK
FOR COMMENTS ON THE APPLICATION FOR CD RADIO, INC. WHICH REQUEST
AUTHORITY TO CONSTRUCT, LAUNCH AND OPERATE A DIGITAL AUDIO
RADIO SERVICE SATELLITE SYSTEM (DAB).

BECAUSE CD RADIO, INC. IS AT THE VANGUARD, I GENERALLY SUPPORT
THEIR APPLICATION. HOWEVER, IN MY OPINION THE CD RADIO APPLI-
CATION FALLS SHORT OF THE MARK. IF CD RADIO, INC. PLANS CALLS FOR
PROGRAMMING TO A SUBSCRIBERS ONLY AUDIENCE, IT IS A GROSS UNDER
UTILIZATION OF THE SPECTRUM. DAB WILL BE THE NEXT EVOLUTION IN
BROADCAST (RADIO) TECHNOLOGY. IT SHOULD BE SHARED BY ANYONE AND
EVERYONE THAT HAS A RECEIVER. IF IT IS LIMITED TO JUST THOSE THAT
CAN AFFORD TO PURCHASE A RECEIVER AND PAY THE SUBSCRIBER FEE, A
VAST NUMBER OF AMERICANS WILL BE LEFT WITHOUT THE SERVICE.

ADDITIONALLY, NOT WITHSTANDING THE WOULD BE PROTECTIONIST AND
ESTABLISHED BROADCASTERS WITH INTEREST IN RADIO, IF WE AMERI-
CANS CHOOSE NOT TO OBTAIN MAXIMUM BENEFIT FROM AND UTILI-
ZATION OF THIS TECHNOLOGY, OTHER COUNTRIES (INCLUDING THE EURO-
PEANS) WILL. THE U. S. LOST SUBSTANTIAL MARKET SHARE IN THE SALES
OF TELEVISION SETS AND OTHER ELECTRONIC ITEMS BECAUSE WE RE-
TREATED. WE CANNOT AFFORD TO BE IN THE RUNNER-UP POSITION AGAIN.

SINCERELY,


JOSEPH JONES
JJcw

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