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NOV 13 1992

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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

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OFFICE OF CHIEF  
DOMESTIC FACILITIES DIVISION  
COMMON CARRIER BUREAU

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  
44/45-DSS-AMEND-92

For the Authority to Construct, Launch  
and Operate Space Stations for the Provision  
of Digital Audio Radio Services

TO: The Commission

COMMENTS OF  
THE RIGHT-ROC GROUP

The Right-Roc Group, located in New York, NY, is in the business of developing a series of syndicated radio programs targeted to Urban America.

We firmly believe that the development of Digital Audio Radio Services, as proposed by **Satellite CD Radio** will be in the public interest for the following reasons:

1. The service will fit the proposed initiatives of the Clinton administration that call for technological advancement with useful commercial applications.
2. Technology developed in U.S., throughout the 80's, seemed to find its way back to us in the form of finished consumer products. This did nothing for the country, on the whole, except increase the size of the trade deficit. **Satellite CD** is in the position of not only developing the technology, but exporting it.
3. The radio industry is increasing consolidation, making it nearly impossible for small to mid-size operators to keep from going dark. **Satellite CD** can provide the industry a needed shot in the arm by allowing the entrepreneur the chance to compete.
4. **Satellite CD Radio** will stimulate the growth of the medium, having an impact in the 90's and beyond, similar to that of FM radio in the 70's. Listeners will now have the best fidelity possible, without having to live through a series of empty promises.

5. Minority industry professionals have little or no opportunity for ownership of transmission properties, given the price of entry and the nature of their specialized program interests. This technology reduces the entry threshold.
  
6. A diversity of programming options should be open to this medium, however, listeners are more often than not left with unimaginative programs from which to choose. **Satellite CD** opens up new possibilities.

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 unique.

Respectfully submitted,

Henry C. Rock II  
Partner  
The Right-Roc Group