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

MAR 1 - 1990

Federal Communications Commission
Office of the Secretary

In the Matter of

HUGHES COMMUNICATIONS
GALAXY, INC.

Request for Authority
to Modify Authorizations
for Galaxy A and Galaxy IV

File Nos. 1-DSS-MP/ML-89
2-DSS-MP/ML-89
3-DSS-ML-89

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MAR 5 1990

Domestic Facilities Division
Satellite Radio Branch

In the Matter of

HUGHES COMMUNICATIONS
GALAXY, INC.

Request for Interim
Assignment of the Galaxy VI
Domestic Fixed-Satellite
to the 99° Orbital Position

File No. 13-DSS-ML-90

INFORMAL COMMENTS OF
NATIONAL PUBLIC RADIO

National Public Radio, Inc. ("NPR") hereby submits informal comments on the above captioned Requests by Hughes Communications Galaxy, Inc. ("Hughes"). Hughes requests authority to modify its existing authorizations for the Ku-band satellite Galaxy A and the C-band satellite Galaxy IV by constructing, launching, and operating a single hybrid satellite ("Galaxy IV") at 99° W.L., with service to commence in 1993. In addition, Hughes requests an interim assignment of its C-band satellite Galaxy VI to 99° W.L. for the period between the end-of-life of Westar IV in 1991 and the beginning-of-service of Galaxy IV in 1993 (the "interim period").

NPR is a nonprofit, noncommercial organization which

provides programming and interconnection services to 384 full-service public radio stations, and represents them in developing and maintaining a viable and diverse public radio service for the American public.

NPR's interest in these proceedings arises from the fact that the Public Radio Satellite Interconnection System ("PR SIS") is the owner of one transponder on the satellite currently located at 99° W.L., Westar IV. NPR manages the PR SIS for the benefit of participating public radio stations under the legislated authority of the Corporation for Public Broadcasting.

NPR has recently concluded an extensive process of identifying replacement space segment capacity for the period following the end-of-life of Westar IV, and has contracted with Hughes for the purchase of two transponders for the public radio system on Galaxy IV, contingent upon Hughes obtaining the necessary authority to construct, launch, and operate Galaxy IV. This service is scheduled to commence in 1993. In addition, NPR has entered into a lease arrangement with Hughes for transponder capacity at 99° during the interim period, contingent upon the ability of Hughes to provide such capacity.

The PR SIS currently consists of more than 300 receive earth terminals located at public radio stations serving all fifty states, as well as twenty-two transmit-capable earth terminals which permit immediate access to the system from widely diverse geographic locations. The existing intact and fully functioning ground system of more than 300 C-band earth

terminals, combined with the inability of existing or planned Ku-band satellites to provide adequate full fifty-state coverage, has contributed in large part to NPR's decision to continue operations at C-band.

Some public radio stations are geographically located in areas that cannot be served by satellites located East of 99° W.L., such as those on the North Slope of Alaska. Thus, a major portion of the domestic satellite arc is precluded from use by the public radio system. In addition, replacement or costly major modifications would be required to many of the system's existing receive antennas if the replacement satellite was located West of the 125° W.L. position. These factors confirm that the 99° W.L. position is particularly well suited for public radio's continued use.

Uninterrupted program delivery to the nation's public radio stations and the listening public will, therefore, be best served by the availability of continuous service at the 99° W.L. position, both during the interim period and upon delivery of permanent replacement satellite capacity. While NPR has taken all steps possible to assure continuity of service in the future, there is still a degree of uncertainty remaining, caused by Hughes' present lack of governmental authority to provide both the interim and permanent service. Since the availability of service at the 99° position is not completely assured during the interim period, NPR has made arrangements for alternative capacity on another satellite should it be required. Major

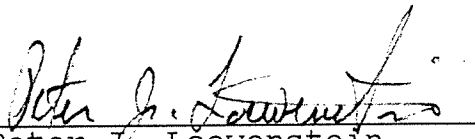
disruption to the Public Radio Satellite System would be caused by the necessity of repointing all of the transmit and receive antennas twice, as well as providing parallel service on two satellites during two separate transition periods.

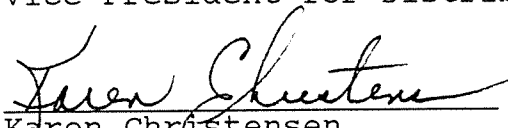
NPR believes that the public interest will be best served by the favorable and timely resolution of the two outstanding Hughes Requests, so that the planning for the future of the Public Radio Satellite Interconnection System can continue with the knowledge that the regulatory issues relating to the availability of space segment have been settled. Continuity of service at 99° W.L. for the PRSIS would provide real and valuable benefits to a large segment of the American public.


NPR respectfully requests that the Commission consider the benefits to the Public Radio Satellite Interconnection System in its decision on the matters raised by the Hughes Requests and rule on these matters favorably and expeditiously.

Respectfully submitted,

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March 1, 1990

CERTIFICATE OF SERVICE

I, Ethyl L. Tiller, hereby certify that on this 1st day of March, 1990, copies of the foregoing were mailed, first class mail, postage prepaid to the following:

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