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November 12, 1999

Magalie Roman Salas, Secretary
Federal Communications Commission
The Portals
445 12th Street, SW
12th Street Lobby, TW-A325
Washington, DC 20054

Received
NOV 17 1999
RECEIVED
NOV 12 1999
Satellite Policy Branch
International Bureau
FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Re: Satellite CD Radio, Inc.
File No. SAT-MOD-19981211-00099

Dear Ms. Salas:

The following is designed to clarify the application in the above file number.

The primary CD Radio earth stations for satellite TT&C (Tracking, Telemetry & Command) are located near Quito, Ecuador and Utiwe, Panama. The stations are operated by remote control from two redundant satellite centers (SCCs) located in New York City, NY and Hawley, PA. The stations are redundant and constructed similarly to remote controlled TT&C stations used on many previous satellite systems dating back to WESTAR. Each station is connected to both SCCs by two redundant full-duplex 128 kb/s circuits leased from international carriers with diverse routing through different transmission facilities. Please also note that, due to redundancy, one TT&C station can operate all three CD Radio satellites over a considerable period of time if the necessity arose and that emergency backup TT&C will be available from an EMBRATEL TT&C station in Guaratiba, Brazil.

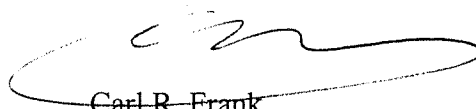
CD Radio has already agreed, if coordination is not feasible, to operate its satellites without TT&C radio transmissions when any satellite is within declinations $\pm 1^\circ$ from the

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geostationary arc. Recent analyses show that it is possible to operate the satellites without TT&C radio transmissions for several degrees further in declination if the necessity arose.

Respectfully yours,



Carl R. Frank
Counsel for Satellite CD Radio, Inc.

CRF/bap

cc:

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