

June 26, 1995

Honorable Rachelle B. Chong
Commissioner
Federal Communications Commission
1919 M Street, N.W.
Washington, D.C. 20554

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

**Re: Satellite Digital Audio Radio
Gen. Docket 90-357, Rm. No. 8610**

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95-91

Dear Commissioner Chong:

It is my understanding that the Federal Communications Commission has recently issued Notice of Proposed Rulemaking regarding service and licensing rules for Satellite Digital Audio Radio ("DARS"). Please associate the comments of Infinity Broadcasting of Detroit, licensee of Radio Station WXYT, Detroit, Michigan below with this rulemaking proceeding. Infinity Broadcasting Corporation, WXYT's parent corporation, may choose to submit comments on this issue prior to the comment deadline, but this letter is submitted to reflect the local perspective of WXYT on service rules and licensing for Satellite DARS.

In my position as General Manager of WXYT, I am acutely aware of the effect that Satellite DARS will have on the local marketplace for radio stations nationwide including WXYT. WXYT supports the Commission's attempts to make technological advances like digital radio available to listeners nationwide. However, as General Manager of an existing radio station competing in the day-to-day marketplace, I believe it is important for the Commission to understand that the decisions it makes with respect to Satellite DARS have the potential to harm the ability of WXYT and other community-based broadcasters to provide local service in the public interest.

As the Commission is well aware, the obligation that broadcasters have to serve their communities of license has always been one of the touchstones of local radio service. WXYT currently fulfills this obligation by providing listeners in the Detroit area with local news and weather reports, disaster warnings, numerous public service announcements, traffic reports and daily News/Talk programs which include thousands of local newsmaker interviews each year which address issues of concern to listeners in the Detroit metropolitan area. WXYT's ability to provide such local programming and services to listeners in Detroit will be dramatically reduced or eliminated in the future if our station is forced to compete for advertising revenue with national state-of-the-art Satellite DARS "super stations". If the Commission allows 60 new satellite super stations to broadcast in the Detroit area, our listeners are likely to tune into WXYT only for local information, thus causing our ratings to drop dramatically along with our revenue and our ultimate ability to remain financially viable.

In contrast to the magnitude of public service programming that stations like WXYT provide, Satellite DARS operators will be unable to duplicate the important public interest benefits of existing local-oriented stations. Yet as described above, the addition of 60 new super stations in the Detroit market will inevitably fragment the audiences that make stations like WXYT viable. In turn, this will jeopardize the important benefits now provided by terrestrial broadcasters, the

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Commissioner Chong
June 26, 1995
Page - 2 -

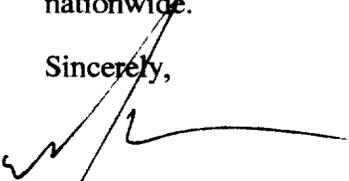
very benefits that national satellite super stations cannot replicate.

In order to minimize the impact of Satellite DARS on existing broadcasters and to preserve local radio service, WXYT respectfully asks the Commission to adopt the following basic principles as it addresses further implementation of Satellite DARS:

- The Commission should remove existing national and local ownership limits on terrestrial broadcasters to allow stations like ours to compete fairly with Satellite DARS operators;
- The Commission should avoid creating a competitive quality gap between existing radio broadcasters and satellite radio by allowing in-band on-channel terrestrial digital radio to be licensed first to determine if Satellite DARS is even needed;
- As part of the Satellite DARS service rules rulemaking, the Commission should seek additional information and studies evaluating the risk of economic harm that Satellite DARS will cause both existing terrestrial radio broadcasters and ultimately local radio service;
- Because they are functionally equivalent to broadcasters, Satellite DARS operators should be subjected to the same public interest obligations as broadcasters, including but not limited to reasonable access and equal opportunities provisions;
- Satellite radio ventures should be prohibited from using ground-based equipment such as terrestrial repeaters to reinforce their signals in urban areas where satellite signals are often blocked;
- Satellite DARS licensees should be required to carry the niche programming (such as service to rural listeners, minorities and ethnic groups) they have promised the FCC they would offer;
- Satellite DARS services should be subscription-supported so that Satellite DARS operators have an economic framework to permit delivery of niche programming to specialized and geographically dispersed markets;
- In order to ensure that Satellite DARS is implemented in a manner that preserves and augments existing local radio, the Commission should allocate 50% of available frequencies to existing radio broadcasters or should open the DARS proceeding to allow new applicants.

WXYT looks forward to working with the Commission as the broadcast industry moves into the digital age. At the same time, WXYT urges the Commission to take into consideration the realities of the existing broadcast marketplace and the importance of local radio service as it move towards bringing technological advances to listeners of our station and other stations nationwide.

Sincerely,



Michael S. Packer
Vice President/General Manager



Infinity Broadcasting Corporation of Atlanta

June 26, 1995

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Honorable Rachelle B. Chong
Commissioner
Federal Communications Commission
1919 M Street, NW
Washington, DC 20554

Re: *Satellite Digital Audio Radio*
Gen. Docket 90-357, Rm. No. 8610

95-91

Dear Commissioner Chong:

It is my understanding that the Federal Communications Commission has recently issued a Notice of Proposed Rulemaking regarding service and licensing rules for Satellite Digital Audio Radio ("DARS"). Please associate the comments of Infinity Broadcasting Corporation of Atlanta, licensee of Radio Station, WZGC-FM, Atlanta, Georgia, below with this rulemaking proceeding. Infinity Broadcasting Corporation, WZGC-FM's parent corporation, may choose to submit comments on this issue prior to the comment deadline, but this letter is submitted to reflect the local perspective of WZGC-FM on service rules and licensing for Satellite DARS.

In my position as General Manager of WZGC-FM, I am acutely aware of the effect that Satellite DARS will have on the local marketplace for radio stations nationwide including WZGC-FM. WZGC-FM supports the Commission's attempts to make technological advances like digital radio available to listeners nationwide. However, as General Manager of an existing radio station competing in the day-to-day marketplace, I believe it is important for the Commission to understand that the decisions it makes with respect to Satellite DARS have the potential to harm the ability of WZGC-FM and other community-based broadcasters to provide local service in the public interest.

As the Commission is well aware, the obligation that broadcasters have to serve their communities of license has always been one of the touchstones of local radio service. WZGC-FM currently fulfills this obligation by providing listeners in the Atlanta area with local news and weather reports, disaster warnings, numerous public service announcements, traffic reports and weekly programs such as "Eye on Atlanta", which airs Sunday mornings and addresses issues of concern to listeners in the Atlanta metropolitan area. WZGC-FM's ability to provide such local programming and services to listeners in Atlanta will be dramatically reduced or eliminated in the future if our station is forced to compete for advertising revenue with national state-of-the-art Satellite DARS "super stations". If the Commission allows 60 new satellite super stations to

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the Atlanta area, our listeners are likely to tune into WZGC-FM only for local information, thus causing our ratings to drop dramatically along with our revenue and ultimate ability to remain financially viable.

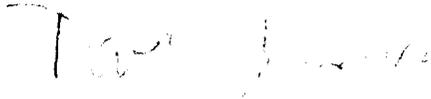
In contrast to the magnitude of public service programming that stations like WZGC-FM provide, Satellite DARS operators will be unable to duplicate the important public interest benefits of existing local-oriented stations. yet as described above, the addition of 60 new super stations in the Atlanta market will inevitably fragment the audiences that make stations like WZGC-FM viable. In turn, this will jeopardize the important benefits now provided by terrestrial broadcasters, the very benefits that national satellite super stations cannot replicate.

In order to minimize the impact of Satellite DARS on existing broadcasters and to preserve local radio service, WZGC-FM respectfully asks the Commission to adopt the following basic principals as it addresses further implementation of Satellite DARS:

- The Commission should remove existing national and local ownership limits on terrestrial broadcasters to allow stations like ours to compete fairly with Satellite DARS operators
- The Commission should avoid creating a competitive quality gap between existing radio broadcasters and satellite radio by allowing in-band on-channel terrestrial digital radio to be licensed first to determine if Satellite DARS is even needed
- As part of the Satellite DARS service rules rulemaking, the Commission should seek additional information and studies evaluating the risk of economic harm that Satellite DARS will cause both existing terrestrial radio broadcasters and ultimately local radio service
- Because they are functionally equivalent to broadcasters, Satellite DARS operators should be subjected to the same public interest obligations as broadcasters, including but not limited to reasonable access and equal opportunities provisions
- Satellite radio ventures should be prohibited from using ground-based equipment such as terrestrial repeaters to reinforce their signals in urban areas where satellite signals are often blocked
- Satellite DARS licensees should be required to carry the niche programming (such as service to rural listeners, minorities and ethnic groups) they have promised the FCC they would offer
- Satellite DARS services should be subscription-supported so that Satellite DARS operators have an economic framework to permit delivery of niche programming to specialized and geographically dispersed markets
- In order to ensure that Satellite DARS is implemented in a manner that preserves and augments existing local radio, the Commission should allocate 50% of available frequencies to existing radio broadcasters or should open the DARS proceeding to allow new applicants.

WZGC-FM looks forward to working with the Commission as the broadcast industry moves into the digital age. At the same time, WZGC-FM urges the Commission to take into consideration the realities of the existing broadcast marketplace and the importance of local radio service as it moves towards bringing technological advances to listeners of our station and other stations nationwide.

Sincerely,

A handwritten signature in black ink, appearing to read "David Meszaros", written over a horizontal line.

David Meszaros
General Manager

KVIL

103.7fm

June 27, 1995

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Honorable Rachelle B. Chong
Commissioner
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1919 M Street, N.W.
Washington, D.C. 20554

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

Re: Satellite Digital Audio Radio
Gen. Docket 90-357, Rm No. 8610

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Dear Commissioner Chong:

95-91

In response to the Federal Communication Commission's Notice of Proposed Rulemaking No. 8610, Infinity Broadcasting of Texas, licensee of KVIL-FM and KDMM-AM, Dallas, Texas submits the following comments on the proposed licensing and service rules for Satellite Digital Audio Radio ("DARS"). KVIL-FM and KDMM-AM parent corporation, Infinity Broadcasting Corporation, may submit its own comments in this docket prior to the comment deadline, but this letter is submitted to reflect the local perspective of KVIL-FM and KDMM-AM on the issue of Satellite DARS.

As General Manager of Radio Station KVIL-FM and KDMM-AM, I am writing to express my concern about the significant impact that Satellite Digital Audio Radio ("DARS") and the licensing and service rules for DARS to be drafted by the FCC will have on KVIL-FM and KDMM-AM and its listeners in the Dallas/Fort Worth area. KVIL-FM and KDMM-AM, along with others in the broadcast industry, supports the Commission's attempt to make technological advances like digital radio available to listeners nationwide. It is important for the Commission to understand, however, that the decisions it makes in bringing about technological changes will dramatically alter the local marketplace for radio stations nationwide and are almost certain to have a negative effect on the ability of local broadcasters such as KVIL-FM and KDMM-AM to serve their communities of license.

As you know, a radio station's basic FCC obligation is to provide the station's community of license with programs to meet its needs and interests. Currently KVIL-FM and KDMM-AM provides listeners with local news and weather reports, disaster warnings, numerous public service announcements, traffic reports and weekly programs such as The Health Show, Money Sense and The Staff Meeting which address issues of concern to listeners in the Dallas /Ft. Worth metropolitan area. In the future, however, if KVIL-FM and KDMM-AM is forced to compete for advertising revenue with 60 new state-of-the-art Satellite DARS "super stations" in our market,

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Commissioner Chong

June 27, 1995

Page - 2 -

KVIL-FM and KDMM-AM may also be forced to dramatically reduce or eliminate many of these local public affairs programs and community outreach efforts. Given the fixed costs of operating a radio station in a highly competitive market such as Dallas/Fort Worth, any loss in national advertising revenues to satellite super stations, however small, will have a significant impact on KVIL-FM and KDMM-AM's overall profits and our ability to serve local needs.

Although proponents of Satellite DARS will argue that KVIL-FM and KDMM-AM's listeners in the Dallas/Fort Worth area will continue to tune into the station for local information, the Commission needs to understand that local radio stations like KVIL-FM and KDMM-AM survive on ratings alone. Our station needs listeners to tune in for a set amount of time each day in order to keep our ratings at a level sufficient to attract local and national advertisers. If 60 new satellite super stations are introduced in the Dallas/Fort Worth area, listeners are likely to tune into existing broadcast stations like KVIL-FM and KDMM-AM only for local information, as needed, thus causing our ratings to drop dramatically along with our revenue and our ultimate ability to remain financially viable. Due to the fact that the Commission's existing ownership rules limit single entities to the ownership of, at most, only four stations in a market, existing operators like KVIL-FM and KDMM-AM have their "hands tied" by regulations even if they want to compete with satellite operators who will have 60 stations in every market.

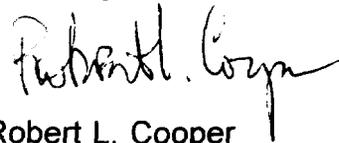
As the Commission considers service and licensing rules for Satellite DARS, it should keep in mind that there are a number of ways to minimize the impact of satellite radio on existing community-based broadcasters such as KVIL-FM and KDMM-AM. First, the Commission should remove existing national and local ownership limits on terrestrial broadcasters to allow a station like ours to compete fairly with satellite operators. Second, the commission should avoid creating a competitive quality gap between existing radio broadcasters and satellite radio by allowing in-band on-channel terrestrial digital radio to be licensed first to determine if Satellite DARS is even needed. Third, satellite radio ventures should be prohibited from using ground-based equipment such as terrestrial repeaters to reinforce their signals in urban areas where satellite signals are often blocked. Fourth, Satellite DARS licensees should be required to carry the niche programming (such as service to rural listeners, minority and ethnic groups) they have promised the FCC they would offer. Fifth, Satellite DARS services should be subscription-supported so that operators have an economic framework to permit delivery of niche programming to specialized or geographically dispersed markets. Sixth, because they are functionally equivalent to broadcasters, DARS operators should be subject to the same public interest obligations as broadcasters, including but not limited to reasonable access and equal opportunity provisions. Finally, in order to ensure that Satellite DARS is implemented in a manner that preserves and augments existing local radio, the

Commissioner Chong
June 27, 1995
Page - 3 -

Commission should allocate 50% of available frequencies to existing radio broadcasters or should open the DARS proceeding to allow new applicants.

KVIL-FM and KDMM-AM looks forward to working with the Commission as the broadcast industry moves into the digital age. At the same time, KVIL-FM and KDMM-AM urges the Commission to take into consideration the realities of the existing broadcast marketplace as it moves towards brings technological advances to listeners of our station and other stations nationwide.

Sincerely,

A handwritten signature in black ink, appearing to read "Robert L. Cooper". The signature is written in a cursive style with a large, prominent "R" and "C".

Robert L. Cooper
General Manager

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY



99.5 FM 1010 AM

9450 Roger Boulevard
St. Petersburg, Florida 33702
813 576 6955
FAX 813 577 1124

Post Office Box 20987
St. Petersburg, Florida 33742

Tampa
813 224-9181

June 26, 1995

Honorable Rachelle B. Chong
Commissioner
Federal Communications Commission
1919 M Street, N.W.
Washington, D.C. 20554

DOCKET FILE COPY ORIGINAL

Re: Satellite Digital Audio Radio
Gen. Docket 90-357, Rm. No. 8610

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95-91

Dear Commissioner Chong:

It is my understanding that the Federal Communications Commission has recently issued a Notice of Proposed Rulemaking regarding service and licensing for Satellite Digital Audio Radio ("DARS"). Please associate the comments of Infinity Broadcasting Corporation of Florida, licensee of Radio Station WQYK-FM, St. Petersburg, Florida with this rulemaking proceeding. Infinity Broadcasting Corporation, WQYK-FM's parent corporation, may choose to submit comments on this issue prior to the comment deadline, but this letter is submitted to reflect the local perspective of WQYK-FM on service rules and licensing for Satellite DARS.

In my position as general manager of WQYK-FM, I am acutely aware of the effect that Satellite DARS will have on the local marketplace for radio stations nationwide including WQYK-FM. WQYK-FM supports the Commission's attempts to make technological advances like digital radio available to listeners nationwide. However, as General Manager of an existing radio station competing in the day-to-day marketplace, I believe it is important for the Commission to understand that the decisions it makes with respect to Satellite DARS have the potential to harm the ability of WQYK-FM and other community based broadcasters to provide local service in the public interest.

As the Commission is well aware, the obligation that broadcasters have to serve their communities of license has always been one of the touchstones of local radio service. WQYK-FM currently fulfills this obligation by providing listeners in the Tampa Bay area with local news and weather reports, disaster warnings, numerous public service announcements, traffic reports and weekly programs such as The Health Journal and Inside Edition which address issues of concern to listeners in the Tampa/St. Petersburg metropolitan area.

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Commissioner Chong
June 26, 1995
Page - 2 -

WQYK-FM's ability to provide such local programming and services to listeners in the Tampa/St. Petersburg area will be dramatically reduced or eliminated in the future if our station is forced to compete for advertising revenue with national state-of-the-art Satellite DARS "super stations". If the Commission allows 60 new satellite super stations to broadcast in the Tampa/St. Petersburg area, our listeners are likely to tune into WQYK-FM only for local information, thus causing our ratings to drop dramatically along with our revenue and our ultimate ability to remain financially viable.

In contrast to the magnitude of public service programming that stations like WQYK-FM provide, Satellite DARS operators will be unable to duplicate the important public interest benefits of existing local-oriented stations. Yet as described above, the addition of 60 new super stations in the Tampa/St. Petersburg market will inevitably fragment the audiences that make stations like WQYK-FM viable. In turn, this will jeopardize the important benefits now provided by terrestrial broadcasters, the very benefits that national satellite super stations cannot replicate. In order to minimize the impact of Satellite DARS on existing broadcasters and to preserve local radio service, WQYK-FM respectfully asks the Commission to adopt the following basic principles as it addresses further implementation of Satellite DARS:

★ The Commission should remove existing national and local ownership limits on terrestrial broadcasters to allow stations like ours to compete fairly with Satellite DARS operators;

★ The Commission should avoid creating a competitive quality gap between existing radio broadcasters and satellite radio by allowing in-band on-channel terrestrial digital radio to be licensed first to determine if satellite DARS is even needed;

★ As part of the Satellite DARS service rules rulemaking, the Commission should seek additional information and studies evaluating the risk of economic harm that Satellite DARS will cause both existing terrestrial radio broadcasters and ultimately local radio service;

★ Because they are functionally equivalent to broadcasters, Satellite DARS operators should be subjected to the same public interest obligations as broadcasters, including but not limited to reasonable access and equal opportunities provisions;

★ Satellite radio ventures should be prohibited from using ground based equipment such as terrestrial repeaters to reinforce their signals in urban areas where satellite signals are often blocked;

Commissioner Chong

June 26, 1995

Page - 3 -

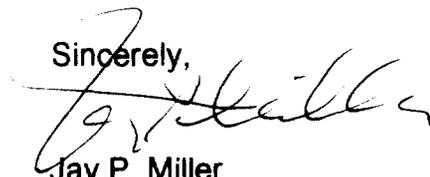
*Satellite DARS licensees should be required to carry the niche programming (such as service to rural listeners, minorities and ethnic groups) they have promised the FCC the would offer;

*Satellite DARS services should be subscription-supported so that Satellite DARS operators have an economic framework to permit delivery of niche programming to specialized and geographically dispersed markets:

*In order to ensure that Satellite DARS is implemented in a manner that preserves and augments existing local radio, the Commission should allocate 50% of available frequencies to existing radio broadcasters or should open the DARS proceeding to allow new applicants.

WQYK-FM looks forward to working with the Commission as the broadcast industry moves into the digital age. At the same time, WQYK-FM urges the Commission to take into consideration the realities of the existing broadcast marketplace and the importance of local radio service as it moves towards bringing technological advances to listeners of our station and other stations nationwide.

Sincerely,



Jay P. Miller

General Manager



99.5 FM 1010 AM

9450 Koger Boulevard
St. Petersburg, Florida 33702
813 576 0655
FAX 813 577 1124

Post Office Box 20087
St. Petersburg, Florida 33742

Tampa
813 224 3187

June 6, 1995

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Honorable Rachelle B. Chong
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Washington, D.C. 20554

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

Re: Satellite Digital Audio Radio
Gen. Docket 90-357, Rm. No. 8610

Dear Commissioner Chong:

In response to the Federal Communications Commission's Notice of Proposed Rulemaking No. 8610, Infinity Broadcasting Corporation of Tampa, Licensee of WQYK-AM, Seffner, Florida submits the following comments on the proposed licensing and service rules for Satellite Digital Audio Radio ("DARS"). WQYK-AM's parent corporation, Infinity Broadcasting Corporation, may submit its own comments in this docket prior to the comment deadline, but this letter is submitted to reflect the local perspective of WQYK-AM on the issue of Satellite DARS.

As General Manager of Radio Station WQYK-AM, I am writing to express my concern about the significant impact that Satellite Digital Audio Radio ("DARS") and the licensing and service rules for DARS to be drafted by the FCC will have on WQYK-AM and its listeners in the Seffner/Tampa/St. Petersburg area. WQYK-AM, along with others in the broadcast industry, supports the Commission's attempts to make technological advances like digital radio available to listeners nationwide. It is important for the Commission to understand, however, that the decisions it makes in bringing about technological changes will dramatically alter the local marketplace for radio stations and are almost certain to have a negative effect on the ability of local broadcasters such as WQYK-AM to serve their communities of license.

As you know, a radio station's basic FCC obligation is to provide the station's community of license with programs to meet its needs and interests. Currently WQYK-AM provides listeners with local news and weather reports, traffic reports and weekly programs such as The Health Journal and Inside Edition which address issues of concern to listeners in the Seffner/Tampa/St. Petersburg Metropolitan area. In the future, however, if WQYK-AM is forced to compete for advertising revenue with 60 new state-of-the-art Satellite DARS "super stations" in our market, WQYK-AM may also be forced to dramatically reduce or eliminate many of these local public affairs

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Commissioner Chong

June 26, 1995

Page - 2 -

programs and community outreach efforts. Given the fixed costs of operating a radio station in a highly competitive market like the Tampa Bay area, any loss in national advertising revenues to satellite super stations, however small, will have a significant impact on WQYK-AM's overall profits and our ability to serve local needs

Although proponents of Satellite DARS will argue that WQYK's listeners in the Seffner/Tampa/St. Petersburg area will continue to tune into the station for local information, the commission needs to understand that local radio stations like WQYK-AM survive on ratings alone. Our station needs listeners to tune in for a set amount of time each day in order to keep our ratings at a level sufficient to attract local and national advertisers. If 60 new satellite super stations are introduced in the Seffner/Tampa/St. Petersburg area, listeners are likely to tune into existing broadcast stations like WQYK-AM only for local information, as needed, thus causing our ratings to drop dramatically along with our revenue and our ultimate ability to remain financially viable. Due to the fact that the Commission's existing ownership rules limit single entities to the ownership of, at most, only four stations in a market, existing operators like WQYK-AM have their "hands tied" by regulations even if they want to compete with satellite operators who will have 60 stations in every market.

As the Commission considers service and licensing rules for Satellite DARS, it should keep in mind that there are a number of ways to minimize the impact of satellite radio on existing community-based broadcasters such as WQYK-AM. First, the Commission should remove existing national and local ownership limits on terrestrial broadcasters to allow a station like ours to compete fairly with satellite operators. Second, the Commission should avoid creating a competitive quality gap between existing radio broadcasters and satellite radio by allowing in-band on-channel terrestrial digital radio to be licensed first to determine if Satellite DARS is even needed. Third, satellite radio ventures should be prohibited from using ground-based equipment such as terrestrial repeaters to reinforce their signals in urban areas where satellite signals are often blocked. Fourth, Satellite DARS licensees should be required to carry niche programming (such as service to rural listeners, minority and ethnic groups) they have promised the FCC they would offer. Fifth, Satellite DARS services should be subscription-supported so that operators have an economic framework to permit delivery of niche programming to specialized or geographically dispersed markets. Sixth, because they are functionally equivalent to broadcasters, DARS operators should be subject to the same public interest obligations as broadcasters, including but not limited to reasonable access and equal opportunity provisions. Finally, in order to ensure that Satellite DARS is implemented in a manner that preserves and augments existing local radio, the Commission should allocate 50% of available frequencies to existing radio broadcasters or should open the DARS proceeding to allow new applicants.

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page - 3 -

WQYK-AM looks forward to working with the Commission as the broadcast industry moves into the digital age. At the same time, WQYK-AM urges the Commission to take into consideration the realities of the existing broadcast marketplace as it moves towards bringing technological advances to listeners of our station and other stations nationwide.

Sincerely,



Jay P. Miller
General Manager

WBCN
104.1FM

The Rock Of Boston

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

Honorable Rachelle B. Chong
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Re: Satellite Digital Audio Radio
Gen. Docket 90-357, Rm. No. 8610

Dear Commissioner Chong:

In response to the Federal Communications Commission's Notice of Proposed Rulemaking No. 8610, Hemisphere Broadcasting Corporation, licensee of WBCN, Boston, Massachusetts submits the following comments on the proposed licensing and service rules for Satellite Digital Audio Radio ("DARS"). WBCN's parent corporation, Infinity Broadcasting Corporation, may submit its own comments in this docket prior to the comment deadline, but this letter is submitted to reflect the local perspective of WBCN on the issue of Satellite DARS.

As General Manager of Radio Station WBCN, I am writing to express my concern about the significant impact that Satellite Digital Audio Radio ("DARS") and the licensing and service rules for DARS to be drafted by the FCC will have on WBCN and its listeners in the Boston area. WBCN, along with others in the broadcast industry, supports the Commission's attempts to make technological advances like digital radio available to listeners nationwide. It is important for the Commission to understand, however, that the decisions it makes in bringing about technological changes will dramatically alter the local marketplace for radio stations nationwide and are almost certain to have a negative effect on the ability of local broadcasters such as WBCN to serve their communities of license.

As you know, a radio station's basic FCC obligation is to provide the station's community of license with programs to meet its needs and interests. Currently WBCN provides listeners with local news and weather reports, disaster warnings, numerous public service announcements, traffic reports and weekly programs such as the Boston Sunday Review which addresses issues of concern to listeners in the Boston metropolitan area.

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In the future, however, if WBCN is forced to compete for advertising revenue with 60 new state-of-the-art Satellite DARS "super stations" in our market, WBCN may also be forced to dramatically reduce or eliminate many of these local public affairs programs and community outreach efforts. Given the fixed costs of operating a radio station in a highly competitive market such as Boston, any loss in national advertising revenues to satellite super stations, however small, will have a significant impact on WBCN's overall profits and our ability to serve local needs.

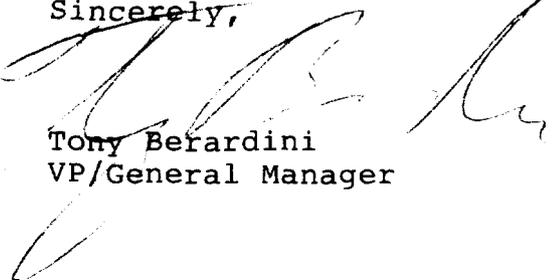
Although proponents of Satellite DARS will argue that WBCN's listeners in the Boston area will continue to tune into the station for local information, the Commission needs to understand that local radio stations like WBCN survive on ratings alone. Our station needs listeners to tune in for a set amount of time each day in order to keep our ratings at a level sufficient to attract local and national advertisers. If 60 new satellite super stations are introduced in the Boston area, listeners are likely to tune into existing broadcast stations like WBCN only for local information, as needed, thus causing our ratings to drop dramatically along with our revenue and our ultimate ability to remain financially viable. Due to the fact that the Commission's existing ownership rules limit single entities to the ownership of, at most, only four stations in a market, existing operators like WBCN have their "hands tied" by regulations even if they want to compete with satellite operators who will have 60 stations in every market.

As the Commission considers service and licensing rules for Satellite DARS, it should keep in mind that there are a number of ways to minimize the impact of satellite radio on existing community-based broadcasters such as WBCN. First, the Commission should remove existing national and local ownership limits on terrestrial broadcasters to allow a station like ours to compete fairly with satellite operators. Second, the Commission should avoid creating a competitive quality gap between existing radio broadcasters and satellite radio by allowing in-band on-channel terrestrial digital radio to be licensed first to determine if Satellite DARS is even needed. Third, satellite radio ventures should be prohibited from using ground-based equipment such as terrestrial repeaters to reinforce their signals in urban areas where satellite signals are often blocked. Fourth, Satellite DARS licensees should be required to carry the niche programming (such as service to rural listeners, minority and ethnic groups) they have promised the FCC they would offer. Fifth, Satellite DARS services should be subscription-supported so that operators have an economic framework to permit delivery of niche programming to specialized or geographically dispersed markets. Sixth, because they are functionally equivalent to broadcasters, DARS operators should be subject to the same public interest obligations as broadcasters, including but not limited to reasonable access and equal opportunity provisions.

Finally, in order to ensure that Satellite DARS is implemented in a manner that preserves and augments existing local radio, the Commission should allocate 50% of available frequencies to existing radio broadcasters or should open the DARS proceeding to allow new applicants.

WBCN looks forward to working with the Commission as the broadcast industry moves into the digital age. At the same time, WBCN urges the Commission to take into consideration the realities of the existing broadcast marketplace as it moves towards bringing technological advances to listeners of our station and other stations nationwide.

Sincerely,



Tony Berardini
VP/General Manager



99.5 WUSN FM-CHICAGO
875 North Michigan Avenue
Suite 1310
Chicago Illinois 60611
312.649.0099
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June 27, 1995

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

Honorable Rachelle B. Chong
Commissioner
Federal Communications Commission
1919 M Street, N.W.
Washington, D.C. 20554

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Re: Satellite Digital Audio Radio
Gen. Docket 90-357, Rm. No. 8610

Dear Commissioner Chong:

In response to the Federal Communications Commission's Notice of Proposed Rulemaking No. 8610, Infinity Broadcasting of Chicago, licensee of WUSN-FM, Chicago, Illinois submits the following comments on the proposed licensing and service rules for Satellite Digital Audio Radio ("DARS"). WUSN-FM parent corporation, Infinity Broadcasting Corporation, may submit its own comments in this docket prior to the comment deadline, but this letter is submitted to reflect the local perspective of WUSN-FM on the issue of Satellite DARS.

As General Manager of Radio Station WUSN-FM, I am writing to express my concern about the significant impact that Satellite Digital Audio Radio ("DARS") and the licensing and service rules for DARS to be drafted by the FCC will have on WUSN-FM and its listeners in the Chicago area. WUSN-FM, along with others in the broadcast industry, supports the Commission's attempts to make technological advances like digital radio available to listeners nationwide. It is important for the Commission to understand, however, that the decisions it makes in bringing about technological changes will dramatically alter the local marketplace for radio stations nationwide and are almost certain to have a negative effect on the ability of local broadcasters such as WUSN-FM to serve their communities of license.

As you know, a radio station's basic FCC obligation is to provide the station's community of license with programs to meet its needs and interests. Currently WUSN-FM provides listeners with local news and weather reports, disaster warnings, numerous public service announcements, traffic reports and weekly programs such as "Chicago Up Close" (Sunday, 7A-9A), which addresses issues of concern to listeners in the Chicago

No. of Copies rec'd 0
List A B C D E

June 27, 1995

Page 2

metropolitan area. In the future, however, if WUSN-FM is forced to compete for advertising revenue with 60 new state-of-the-art Satellite DARS "super stations" in our market, WUSN-FM may also be forced to dramatically reduce or eliminate many of these local public affairs programs and community outreach efforts. Given the fixed costs of operating a radio station in a highly competitive market such as Chicago, any loss in national advertising revenues to satellite super stations, however small, will have a significant impact on WUSN-FM's overall profits and our ability to serve local needs.

Although proponents of Satellite DARS will argue that WUSN-FM's listeners in the Chicago area will continue to tune into the station for local information, the Commission needs to understand that local radio stations like WUSN-FM survive on ratings alone. Our station needs listeners to tune in for a set amount of time each day in order to keep our ratings at a level sufficient to attract local and national advertisers. If 60 new satellite super stations are introduced in the Chicago area, listeners are likely to tune into existing broadcast stations like WUSN-FM only for local information, as needed, thus causing our ratings to drop dramatically along with our revenue and our ultimate ability to remain financially viable. Due to the fact that the Commission's existing ownership rules limit single entities to the ownership of, at most, only four stations in a market, existing operators like WUSN-FM have their "hands tied" by regulations even if they want to compete with satellite operators who will have 60 stations in every market.

As the Commission considers service and licensing rules for Satellite DARS, it should keep in mind that there are a number of ways to minimize the impact of satellite radio on existing community-based broadcasters such as WUSN-FM.

First, the Commission should remove existing national and local ownership limits on terrestrial broadcasters to allow a station like ours to compete fairly with satellite radio by allowing in-band on-channel terrestrial digital radio to be licensed first to determine if Satellite DARS is even needed. Third, satellite radio ventures should be prohibited from using ground-based equipment such as terrestrial repeaters to reinforce their signals in urban areas where satellite signals are often blocked. Fourth, Satellite DARS licensees should be required to carry the niche programming (such as service to rural listeners, minority and ethnic groups) they have promised the FCC they would offer. Fifth, Satellite DARS services should be subscription-supported so that operators have an economic framework to permit delivery of niche programming to specialized or geographically dispersed markets. Sixth, because they are functionally equivalent to broadcasters, DARS operators should be subject to the same public interest obligations as broadcasters, including but not limited to reasonable access and equal opportunity provisions. Finally, in order to ensure that Satellite DARS is implemented in a manner

June 27, 1995

Page 3

that preserves and augments existing local radio, the Commission should allocate 50% of available frequencies to existing radio broadcasters or should open the DARS proceeding to allow new applicants.

WUSN-FM looks forward to working with the Commission as the broadcast industry moves into the digital age. At the same time, WUSN-FM urges the Commission to take into consideration the realities of the existing broadcast marketplace as it moves towards bringing technological advances to listeners of our station and other stations nationwide.

Sincerely,

A handwritten signature in black ink, reading "Stephen D. Ennen". The signature is written in a cursive style with a large, looping initial "S".

Stephen D. Ennen
General Manager

Georgetown Station
Post Office Box 3649
Washington, D.C. 20007
703 691 1900
FAX: 703 385 0189



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July 6, 1995

Honorable Rachelle B. Chong
Commissioner
Federal Communications Commission
1919 M Street, N.W.
Washington, D.C. 20554

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Dear Commissioner Chong:

In response to the Federal Communications Commission's Notice of Proposed Rulemaking No. 8610, Infinity Broadcasting of Washington, D.C., licensee of WJFK-FM, Washington, D.C. submits the following comments on the proposed licensing and service rules for Satellite Digital Audio Radio ("DARS"). WJFK-FM's parent corporation, Infinity Broadcasting Corporation, may submit its own comments in this docket prior to the comment deadline, but this letter is submitted to reflect the local perspective of WJFK-FM on the issue of Satellite DARS.

As General Manager of Radio Station WJFK-FM, I am writing to express my concern about the significant impact that Satellite Digital Audio Radio ("DARS") and the licensing and service rules for DARS to be drafted by the FCC will have on WJFK-FM and its listeners in the Manassas and Washington, D.C. areas. WJFK-FM, along with others in the broadcast industry, supports the Commission's attempts to make technological advances such as digital radio available to listeners nationwide. It is important for the Commission to understand, however, that the decisions it makes in bringing about technological changes will dramatically alter the local marketplace for radio stations nationwide and are almost certain to have a negative effect on the ability of local broadcasters such as WJFK-FM to serve their communities of license.

As you know, a radio station's basic FCC obligation is to provide the station's community of license with programs to meet its needs and interests. Currently WJFK-FM provides listeners with local news and weather reports, disaster warnings, numerous public service announcements, traffic reports and weekly programs such as "The Environment Show," "The Source Report," "Washington Weekly," and "Focus on Manassas" which address

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List A B C D E



Commissioner Chong
July 6, 1995
Page Two

issues of concern to listeners in the Manassas and Washington, D.C. metropolitan areas. In the future, however, if WJFK-FM is forced to compete for advertising revenue with 60 new state-of-the-art Satellite DARS "super stations" in our market, WJFK-FM may be forced to dramatically reduce or eliminate many of these local public affairs programs and community outreach efforts. Given the fixed costs of operating a radio station in a highly competitive market such as Washington, D.C., any loss in national advertising revenues to satellite super stations, however small, will have a significant impact on WJFK-FM's overall profits and our ability to serve local needs.

Although proponents of Satellite DARS will argue that WJFK-FM's listeners in the Washington, D.C. area will continue to tune into the station for local information, the Commission needs to understand that local radio stations like WJFK-FM survive on ratings alone. Our station needs listeners to tune in for a set amount of time each day in order to keep our ratings at a level sufficient to attract local and national advertisers. If 60 new satellite super stations are introduced in the Washington, D.C. area, listeners are likely to tune into existing broadcast stations like WJFK-FM only for local information, as needed, thus causing our ratings to drop dramatically along with our revenue and our ultimate ability to remain financially viable. Due to the fact that the Commission's existing ownership rules limit single entities to the ownership of, at most, only four stations in a market, existing operators like WJFK-FM have their "hands tied" by regulations even if they want to compete with satellite operators who will have 60 stations in every market.

As the Commission considers service and licensing rules for Satellite DARS, it should keep in mind that there are a number of ways to minimize the impact of satellite radio on existing community-based broadcasters such as WJFK-FM.

First, the Commission should remove existing national and local ownership limits on terrestrial broadcasts to allow a station like ours to compete fairly with satellite operators. Second, the Commission should avoid creating a competitive quality gap between existing radio broadcasters and satellite radio by allowing in-band on-channel terrestrial digital radio to be licensed first to determine if Satellite DARS is even needed. Third, satellite radio ventures should be prohibited from using ground-based equipment such as



Commissioner Chong
July 6, 1995
Page Three

terrestrial repeaters to reinforce their signals in urban areas where satellite signals are often blocked. Fourth, Satellite DARS licensees should be required to carry the niche programming (such as service to rural listeners, minority and ethnic groups) they have promised the FCC they would offer. Fifth, Satellite DARS services should be subscription-supported so that operators have an economic framework to permit delivery of niche programming to specialized or geographically dispersed markets. Sixth, because they are functionally equivalent to broadcasters, DARS operators should be subject to the same public interest obligations as broadcasters, including but not limited to reasonable access and equal opportunity provisions. Finally, in order to ensure that Satellite DARS is implemented in a manner that preserves and augments existing local radio, the Commission should allocate 50% of available frequencies to existing radio broadcasters or should open the DARS proceeding to allow new applicants.

WJFK-FM looks forward to working with the Commission as the broadcast industry moves into the digital age. At the same time, WJFK-FM urges the Commission to take into consideration the realities of the existing broadcast marketplace as it moves toward bringing technological advances to listeners of our station and other stations nationwide.

Sincerely,

Kenneth C. Stevens
Vice President/General Manager

KCS/mab



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Honorable Rachelle B. Chong
Commissioner
Federal Communications Commission
1919 M Street, N.W.
Washington, D.C. 20554

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Dear Commissioner Chong:

In response to the Federal Communications Commission's Notice of Proposed Rulemaking No. 8610, Infinity Broadcasting of Pennsylvania, licensee of WYSP-FM, Philadelphia, Pennsylvania submits the following comments on the proposed licensing and service rules for Satellite Digital Audio Radio ("DARS"). WYSP-FM's parent corporation, Infinity Broadcasting Corporation, may submit its own comments in this docket prior to the comment deadline, but this letter is submitted to reflect the local perspective of WYSP-FM on the issue of Satellite DARS

As General Manager of Radio Station WYSP-FM, I am writing to express my concern about the significant impact that Satellite Digital Audio Radio ("DARS") and the licensing and service rules for DARS to be drafted by the FCC will have on WYSP-FM and its listeners in the Philadelphia area. WYSP-FM, along with others in the broadcast industry, supports the Commission's attempts to make technological advances such as digital radio available to listeners nationwide. It is important for the Commission to understand, however, that the decisions it makes in bringing about technological changes will dramatically alter the local marketplace for radio stations nationwide and are almost certain to have a negative effect on the ability of local broadcasters such as WYSP-FM to serve their communities of license.

As you know, a radio station's basic FCC obligation is to provide the station's community of license with programs to meet its needs and interests. Currently WYSP-FM provides listeners with local news and weather reports, disaster warnings, numerous public service announcements, traffic reports and weekly programs such as "Rutgers Forum," "What You Should Know," "Sunday Radio Times," and "Tom Cardella's Ninety Forum" which

No. of Copies rec'd 0
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Commissioner Chong
July 6, 1995
Page Two

address issues of concern to listeners in the Philadelphia metropolitan area. In the future, however, if WYSP-FM is forced to compete for advertising revenue with 60 new state-of-the-art Satellite DARS "super stations" in our market, WYSP-FM may be forced to dramatically reduce or eliminate many of these local public affairs programs and community outreach efforts. Given the fixed costs of operating a radio station in a highly competitive market such as Philadelphia, any loss in national advertising revenues to satellite super stations, however small, will have a significant impact on WYSP-FM's overall profits and our ability to serve local needs

Although proponents of Satellite DARS will argue that WYSP-FM's listeners in the Philadelphia area will continue to tune into the station for local information, the Commission needs to understand that local radio stations like WYSP-FM survive on ratings alone. Our station needs listeners to tune in for a set amount of time each day in order to keep our ratings at a level sufficient to attract local and national advertisers. If 60 new satellite super stations are introduced in the Philadelphia area, listeners are likely to tune into existing broadcast stations like WYSP-FM only for local information, as needed, thus causing our ratings to drop dramatically along with our revenue and our ultimate ability to remain financially viable. Due to the fact that the Commission's existing ownership rules limit single entities to the ownership of, at most, only four stations in a market, existing operators like WYSP-FM have their "hands tied" by regulations even if they want to compete with satellite operators who will have 60 stations in every market.

As the Commission considers service and licensing rules for Satellite DARS, it should keep in mind that there are a number of ways to minimize the impact of satellite radio on existing community-based broadcasters such as WYSP-FM.

First, the Commission should remove existing national and local ownership limits on terrestrial broadcasts to allow a station like ours to compete fairly with satellite operators. Second, the Commission should avoid creating a competitive quality gap between existing radio broadcasters and satellite radio by allowing in-band on-channel terrestrial digital radio to be licensed first to determine if Satellite DARS is even needed. Third, satellite radio ventures should be prohibited from using ground-based equipment such as