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Interest: Professor in the Faculty of Instructional Technology in the College of Education at Northern Illinois University.

General support for SDARS:

- SDARS appears to have the potential to expand the availability of educational programming.
 - Particularly in rural areas.

Licensing policies:

- The Commission should note the commercial motives of the license applicants and should consider both safeguards and incentives to insure broad access (apparently for high quality educational material).

Cedric R. Hendricks

Interest: former producer of public affairs programming for radio and television.

General support for SDARS:

- SDARS will provide important new opportunities for distributing radio programming.

Licensing policies:

- The companies that are licensed to provide SDARS should be required to provide access to, and programming for minority groups.

IOTEX Communications, Inc.

Interest: holder of exclusive license to a communications technology.

General support for SDARS:

- SDARS must be authorized promptly in order to maintain the United States as a world leader in this field.
 - Advances in compression technology will allow greatly expanded use of the radio frequency spectrum.
 - The United States should lead in this development.

**The Institute of Electrical and Electronic Engineers,
United States Activities Board**

Interest: promoting the career and technology policy interests of professional engineers.

General support for SDARS:

- SDARS will contribute to the advancement of the U.S. technology base.
 - This will assist other U.S. industries and improve this country's ability to compete internationally.
- There is considerable consumer demand for high-quality digital music which SDARS will satisfy.
- SDARS will provide more diverse services and services to people who are currently unserved.

Technical standards:

- SDARS is technically feasible at an economical costs.

Miscellaneous issues:

- Terrestrial radio should also be permitted to convert to digital.

KJAZZ Satellite Radio

Interest: Non-profit organization dedicated to the furtherance and education of mainstream jazz.

General support for SDARS:

- Less than 40 of the 8-9,000 commercial radio stations in the country play jazz.
 - Yet 3-5% of the audience prefer jazz.
- Jazz was transmitted via satellite on SATECOM I from 1994 till August 14, 1995.
 - The principle reason the national satellite jazz program was forced off the air was because of the inability of people to receive the signal in their cars.
- SDARS would make jazz music available again to jazz lovers.

Maine Farm Bureau Association

Interest: 5000 member farming organization.

General support for SDARS:

- SDARS is greatly needed by the members of our organization.
 - many of them have extremely limited access to audio entertainment and to sources of information.
 - Every effort needs to be made to speed up the licensing process.

Media Access Project (UCLA Law School)

Interest: Law school project

General support for SDARS:

- The Media Access Project supports SDARS to the extent that it can achieve the goals of CD quality sound and service to unserved or underserved markets, so long as it provides the promised niche and special interest programming, and does not destroy local broadcast radio. (ii, 2)

Effect of SDARS on conventional broadcasters:

- FCC should take all steps necessary to protect terrestrial broadcast radio because terrestrial broadcast radio provides communities with local programming and is available for free to 100% of the American public. (5-10)
- SDARS may significantly reduce the advertising revenues of conventional broadcast stations. (11-12)

Regulatory classification:

- SDARS should be regulated as broadcasters and subjected to public interest obligations such as providing access to federal and local political candidates, and ensuring that individuals who are personally attacked are provided the right to reply. (ii, 13-15)
- Regardless of whether SDARS is classified as broadcasting, a non-broadcast entity, or common carrier, it should be subject to public interest requirements. (ii, 15-18, 18-21)

Minnesota Public Radio
(27 FM stations; 1 AM station; 18 translators)

Interest: Public Radio Broadcaster

General support for SDARS:

- SDARS can better serve rural and unserved or underserved metro audiences with cultural, educational, and public affairs programming.
- SDARS could provide varied general and niche programming and CD quality sound to the entire United States.
- SDARS could deliver specialized, well-targeted noncommercial, educational, public service programming to national audiences in an efficient and inexpensive manner.

Licensing Policies:

- Commission should reserve 20% of any digital satellite spectrum for public radio use.

Minority Media and Telecommunications Council

Interest: Special interest group supporting policies which would enhance the opportunities of minorities to participate in the ownership and programming of DAR facilities.

Licensing policies:

- If SDARS is authorized, it should be licensed to a racially diverse set of licensees. (1-2)
- To foster minority ownership, the Commission should either start fresh, *i.e.*, accept new applications, and license systems or comparative hearings or hold an auction with substantial minority-sensitive bidding credits. (2-3)
- Each licensee should set aside one channel for noncommercial public access and one channel for minority entrepreneurial access. (3-4)
- Commission should enforce a strict, one-per-customer, multiple ownership rule.

Regulatory classification:

- SDARS should be regulated as common carriers, with appropriate public interest protections. (3-5)

Miscellaneous issues:

- Licensees must provide equal employment opportunity. (5)

Mixed Media, Inc.

Interest: non-profit producer of media related to artistic, informational and cultural issues.

General support for SDARS:

- SDARS can provide high-quality, diverse programming to a greatly increased number of people.
 - Since the technology has been available for years it should be quickly authorized.

Model Transit, Inc.

Interest: private provider of commuter bus service.

General support for SDARS:

- Model Transit is attempting to encourage mass transit through the provision of improved commuter bus services.
 - SDARS could assist this effort by providing high quality audio that could be provided in our buses.

Muzak, DBS Division

Interest: delivery of audio programming to fixed locations.

General support or opposition to SDARS:

SDARS will open new marketing opportunities for Muzak.

- SDARS will allow the distribution of music to a much wider audience at a much lower cost.

National Asian American Telecommunications Association

Interest: promoting interests of Asian Americans in the media

General support for SDARS:

- SDARS would benefit remote and niche audiences.
- SDARS would make it possible to provide niche programming for non-english speaking ethnic groups whose populations are scattered and do not have programs directed at their interests and needs.
- Audiences are very aware of the benefits of high quality audio and a technology that provides it should be licensed.

National Public Radio, Inc.

Interest: Development of diversified noncommercial educational radio.

Licensing policies:

- Issue is not only how to ensure continued viability of conventional broadcasters but how DARS will best serve the public interest. (2)
- FCC has several alternatives to ensure the delivery of educational, cultural, and informational programming to unserved and underserved audiences. (2)
 - reserve portion of DARS channel capacity for access by public services or
 - have DARS licensees commit to a minimum amount of such programming.

**New York Chinatown
Senior Citizen Center, Inc.**

Interest: Service to Chinese elderly.

General support for SDARS:

- A Chinese station would help bridge the information gap between Chinese communities and mainstream America.

NIALL Enterprises, Inc.

Interest: Small business offering mobile data link services to aviation.

General support for SDARS:

- SDARS could disseminate important weather information for small aircraft, campers, hikers, and people in rural areas.

Orbital Sciences Corporation

Interest: Designer and manufacturer of launch vehicles and satellites.

Regulatory classification:

- Allowing ancillary services will promote full and efficient use of the spectrum and lower prices, particularly early on as SDARS seeks to establish itself. (3-4)

General support for Satellite DARS:

- SDARS will stimulate the economy by the creation of jobs in numerous sectors, including programming.
- SDARS will help ensure U.S. satellite industry remains the world leader.
- A big market will develop for receivers.

Technical standards:

- From its "extensive experience in designing and manufacturing low cost satellite navigation [GPS] receivers," Orbital concludes the SDARS receivers can be offered "at attractive consumer prices." (3)

Owner-Operator Independent Drivers Association, Inc.

Interest: Association of independent truck drivers (More than 30,000 members who own about 50,000 trucks).

General support for SDARS:

- The operations of our members, "the carriage of commercial and private goods to and from locations across the United States[,] . . . are often out of range of the reception of conventional audio broadcasting."
- SDARS "has the potential to enhance the quality of life" for our members "by expanding the diversity of information and entertainment options receivable while on the road in rural and remote locations."
- "We are aware of the time that has already elapsed since satellite radio technology was developed." Therefore, we urge the FCC to authorize SDARS.

Pandora Data Corporation

Interest: Corporation that provides specialized on-line political and military information.

General support for SDARS:

- Pandora has a commercial interest in finding and marketing highly specialized information that requires the efficiencies of advanced technology.
- To date, promoters of SDARS have had to overcome regulatory obstacles that serve only to stymie alternate channels of communication, for specialized political information, for example.
- SDARS should be given its chance to develop.

Radio Order Corporation

Interest: Designing/developing a tuner to receive DARS program audio and "certain digitally encoded voice signals," *i.e.* a DARS voice messaging system.

Regulatory classification:

- DARS rules should support certain services as primary or permanent ancillary services, namely song-related voice messaging. (2 ff)
 - The messaging system would allow listeners to access information regarding song title, artist, record/CD label, etc., during uninterrupted music.
 - Such voice messaging is more safe than text messaging for operators of vehicles.
- Radio Order maintains that song-related voice messaging should be primary because it meets the four-parts of the proposed definition of DARS: (1) CD quality, (2) audio programming, (3) digitally transmitted, (4) direct to receiver. (4-8)
 - the messages are programming because they will meet the "parameters" of the artists' voices and will provide entertainment value to listeners.
- The requested primary service classification for song-related video messaging will not result in a *de facto* reclassification. (7-8)
 - As an analogy, voice messaging is considered by the EC as a primary part of DAB audio service.
- If considered ancillary, song-related messaging should be deemed as "permanent ancillary service." (9-12)
 - Song-related messaging will:
 - foster provision of DARS service
 - provide a potential additional source of revenue and reduce the financial risk of DARS.
 - not hamper the provision of primary DARS service.

Recreation Vehicle Dealers Association

Interest: representing 3,000 RV dealers.

General support for SDARS:

- The 9 million RV owners in this country could make great use of SDARS.
 - When travelling across the country radio programming is frequently interrupted due to distance, terrain or electrical storms.

Recreational Vehicle Industry Association

Interest: Trade association representing the manufacturers of recreation vehicles

General support of SDARS:

- RV owners demand the latest technology in their units. Because RVs are very mobile and often travel to remote locations where radio and television programming and reception is extremely limited, many RV owners have already installed satellite units on top of their RVs. SDARS would provide the same benefit with an antenna the size of a silver dollar and at a fraction of the costs.

Rollens Hudig Hall of Virginia, Inc.

Interest: insurance broker active in aviation and space.

General support for SDARS:

- The technology proposed for SDARS is workable, sound and insurable.
- SDARS would contribute to the growth and health of the U.S. space and associated industries.

**Satellite Broadcasting and
Communications Association of America (SBCA)**

Interest: National trade association of Direct-to-Home (DTH) satellite industry.

General support for SDARS:

- FCC should take "prompt" action to ensure commencement of SDARS to the public.
- Rural listeners will obtain great benefit from SDARS; they now have little to choose from, both at home and in their vehicles. (3-4)

Licensing policies:

- SBCA opposes the use of auctions to license DARS. (5)
 - Auctions will discourage, rather than promote, entrepreneurial use of the airwaves.
 - There is no mutual exclusivity in many cases. (5)
 - Auctions where services are nearing fruition, such as DARS, will result in hidden taxes to consumers. (6)
 - By using auctions, FCC will give incentive to other countries to do the same. (6-7)
- Any action to reopen the application window would be inequitable to existing applicants, who acted in good faith that the FCC would proceed to license by the ground rules the Commission established. (7-8)
- Reopening the filing window will artificially create mutual exclusivity and destroy incentives for proponents of new services to engage in innovative efforts. (8)
- SBCA opposes reopening of application windows.
- The FCC should expedite licensing of these services. (3)

Seavey Engineering Associates

Interest: designs and manufactures satellite earth station equipment.

General support for SDARS:

- Seavey wishes to encourage prompt approval of SDARS because this company has invested considerable funds developing a small antenna suitable for reception of SDARS
- SDARS will create jobs -- particularly in the depressed New England states where Seavey manufacturing operations take place.
- The United States should be a world leader in developing SDARS. Delays will only cost this country money.
- SDARS is the most efficient and highest quality entertainment option so it should be approved.