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October 12, 1995

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Via Overnight Delivery

Mr. William F. Caton
Acting Secretary
Federal Communications Commission
1919 M Street, N. W.
Washington, D. C. 20554

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FCC MAIL ROOM

RE: Establishment of Rules and Policies for the Digital Audio Radio Satellite Service
in 2310-2360 Mhz Frequency Band
IB Dicket No. 95-91; GEN Docket No. 90-357; RM No. 8610; PP-24, PP-86;
PP-87

Dear Mr. Caton:

Enclosed please find an original and eleven copies of Reply Comments of Amaturro Group
of Texas, Ltd., Amaturro Group of California, Ltd. and Amaturro Group of L. A., Ltd.

Any questions you have should be directed to the undersigned.

Very truly yours,



Cara Ebert Cameron

CEC:gg

Enclosures

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BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D. C. 20554

In the Matter of)
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Establishment of Rules and)
Policies for the Digital Audio)
Radio Satellite Service in the)
2310-2360 Mhz Frequency Band)
)
)

IB Docket No. 95-91
GEN Docket No. 90-357
RM No. 8610
PP-24
PP-86
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To: The Commission

REPLY COMMENTS OF
AMATURO GROUP OF TEXAS, LTD.
AMATURO GROUP OF CALIFORNIA, LTD.
AMATURO GROUP OF L.A., LTD.

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The Amaturro Group of Radio Stations (Amaturro) consisting of KKMJ (FM), Austin, Texas, KAMX (FM), Luling, Texas, KJCE, Rollingwood, Texas, KFRG (FM), San Bernardino, California, KOOJ (FM), Riverside, California and applicant for Assignment of License for KNJO (FM), Thousand Oaks, California, KRCI (FM), Avalon, California and KWXH (FM), Sun City, California hereby submits its reply comments in the above-captioned proceedings:

I, as General Partner of Amaturro Group have spent the past forty-six years exclusively in the broadcast industry. The past thirty-nine years have been spent as an owner/manager, mostly of radio properties that operated in some fifteen separate markets from Florida to California, in cities as large as Miami-Fort Lauderdale, Los Angeles, Houston, Indianapolis, St. Louis and as small as Southbridge, Massachusetts, Hartford, Connecticut, Russellville, Kentucky and St. Joseph, Missouri.

I know and believe I understand that localism absolutely is the fundamental principle for radio as well as television. Local programming, local announcements, local identity, local diversity and local connectness are basic to economic survival as well as serving the public interest.

DARS would provide satellite radio service on an impersonal basis and absolutely a non-local service basis as well. To understand that, imagine a local television station that would allow the language or visual depravity that is available ONLY on a non-local cable service basis. If those satellite networks, i.e. HBO, etc. had to serve and depend on local acceptance, those pictures and that language would depart overnight!

DARS would succeed in providing more diversity, but it would really weaken the ability of local stations to maintain, forget improve, their local service. Is that a risk anyone who believes in localism should assume? Although the greatest down-grading of local service would be in the smaller markets, of course DARS would affect negatively, local service in every market.

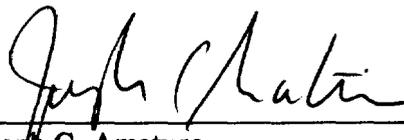
This new DARS technology should be utilized but not to help destroy a proven local service with a seventy-five year tradition of concerned and effective value to the public.

I urge the Commissioners not to sacrifice the thousands of diverse terrestrial broadcasters to the few who would have the vast resources necessary to implement DARS. If DARS is inevitable, the Commission must consider and adopt those proposals as set forth by the NAB and Entertainment Communications, Inc. in structuring a satellite DARS service that will serve the public interest, not the interest of a select few at the expense of endangering the viability of the

present system of local community based broadcasting.

Respectfully submitted,

AMATURO GROUP OF TEXAS, LTD.
AMATURO GROUP OF CALIFORNIA,
LTD. and AMATURO GROUP OF L.A.
LTD.

By: 

Joseph C. Amaturio
General Partner

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