

Congress of the United States  
Washington, DC 20515

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OCT 11 1995

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF SECRETARY

September 20, 1995

The Honorable Reed E. Hundt  
Chairman  
Federal Communications Commission  
1919 M Street NW, Room 814  
Washington, D.C. 20554

DOCKET FILE COPY ORIGINAL

Dear Chairman Hundt:

It has been brought to my attention that the Federal Communications Commission recently issued a Public Notice seeking comment on a number of satellite applications. In particular, we would like to bring to your attention Teledesic Corporation, a Washington-based company which has a pending application to provide global, broadband, non-geostationary satellite service.

Like many other states, Washington has a vital economic interest in seeing the deployment of broadband satellite systems such as Teledesic. In the years ahead, affordable access to advanced digital broadband network connections is going to be essential to the competitiveness of small and medium-size businesses. Unlike large enterprises located in the most densely populated areas that can afford to lease dedicated fiber connections, many businesses in states like Washington are at risk of being isolated from these advanced network capabilities. Satellite systems such as Teledesic offer the means to bring affordable access to two-way, switched broadband services to areas that otherwise will likely remain unserved.

Therefore, we would like to encourage the FCC to process the Teledesic application in a fair and reasonable manner that minimizes unnecessary administrative delays and is responsive to the economic benefits inherent in the rapid deployment of such an innovative satellite system. Without question, delays in licensing new services in the United States will, in the end, work against our global interests and against the current worldwide leadership enjoyed by the U.S. commercial satellite industry.

Thank you for your prompt consideration of this matter.

Sincerely,

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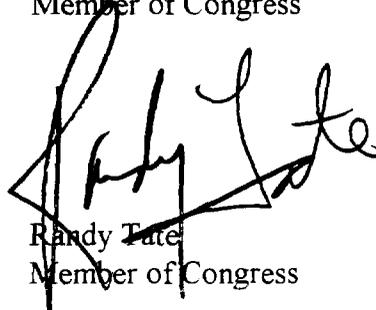
Rick White  
Member of Congress



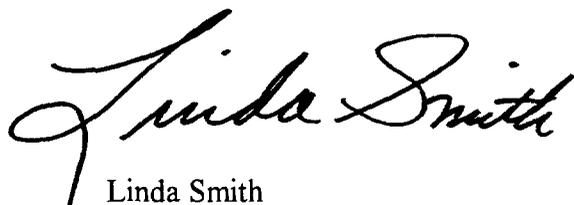
Jennifer Dunn  
Member of Congress



George Nethercutt, Jr.  
Member of Congress



Randy Tate  
Member of Congress



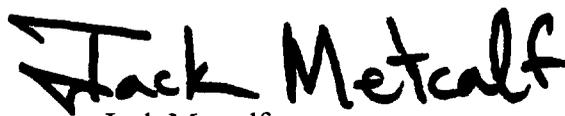
Linda Smith  
Member of Congress



Norman D. Dicks  
Member of Congress



Richard "Doc" Hastings  
Member of Congress



Jack Metcalf  
Member of Congress



Jim McDermott  
Member of Congress

cc: Commissioner Susan Ness  
Commissioner Andrew C. Barrett  
Commissioner James H. Quello  
✓ Commissioner Rachelle B. Chong

# **BSB Communications**

**Consulting • Engineering • Properties  
FM Specialists • Turnkey Projects**

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AUG 11 1995

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF SECRETARY

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August 23, 1995

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

Dear Commissioner Chong,

I am a small market broadcaster concerned about the implementation of DARS and its subsequent impact on local terrestrial broadcasters.

I could not afford counsel so I filed these comments myself. Please read them and consider these remarks when making decisions regarding Satellite Delivered DARS.

Kindest regards,



Tony Bono  
BSB communications  
KQSY Collinsville, OK

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Before the  
**FEDERAL COMMUNICATIONS COMMISSION**

Washington, D.C. 20554

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OCT 11 1995

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF SECRETARY

In the Matter of )  
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 )  
Comments for DARS ) Docket # 90-357  
Rules with regard to the )  
Establishment and Regulation of )  
New Digital Audio Radio Services )

August 23, 1995

Again I ask the FCC to reconsider the act of implementation or the manner of implementation of DARS in the form of Satellite Delivered Radio Services. I believe this service will flood markets with too many radio services, duplicating already existing service, and causing economic difficulty for local terrestrial broadcasters. Local terrestrial radio station audiences would shrink, lessening radio advertising dollars, and thus decreasing dollars available to fund local services. Local service would decrease because of economics. Medium to small market terrestrial broadcasters would suffer the most, although larger markets would also feel the economic impact of over competition. It would create too many signals, too many choices for the radio listener. There's too many signals now, so just imagine an additional 20 to 60 signals in every market. Not many local terrestrial stations would be able to stay in business resulting in less diversification and a reduction in local service.

I think it would be in the best interest of the listener, the local market, and local terrestrial radio to limit Satellite Delivered DARS to subscription service only! (If it were to be allowed at all since it is a duplication of service). I urge the FCC to not allow DARS to have terrestrial repeaters which would be even more directly competing with local terrestrial radio stations. Satellite service should remain satellite service without the unfair advantage of terrestrial aid.

I am in favor of reopening the application process for DARS (if the service came into being). It appears the competition in regard to DARS is in the hands of the few. To me it seems it would be better to allow more diversification of this, hopefully, subscription service via satellite.

Please here the pleas of local broadcasters who realize the looming impact of Satellite Delivered Radio on local terrestrial radio. Local broadcasters have been the backbone of radio and it is tragic to disregard the localized system we have now for a "national" type of radio service. Satellite Delivered DARS will hurt the local broadcaster and will eventually cause a reduction in service. If DARS were implemented as a commercial radio service via satellite (available to all) the USA would end up with radio transmission in the hands of a few large national companies. Diversification would decrease at the expense of local service.

Please, at the bare minimum, limit DARS to subscription service only. This would allow service to remote areas and would hopefully provide some salvation to local terrestrial broadcasters.

Tony Bono  
BSB Communications  
KQSY Collinsville, OK

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NEW YORK'S CHRISTIAN RADIO

September 7, 1995

Secretary  
 Federal Communications Commission  
 1919 M Street, Northwest  
 Washington, DC 20554

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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF SECRETARY

Re: DARS

Dear Secretary of the FCC:

I am writing in opposition to digital radio by satellite. This new development is an economic threat to our local radio station, and indeed to local stations and broadcasters all over the country. As the attached chart indicates, we derive more than 50% of our revenue from national program and spot advertisers. This national income allows us to make available to worthy local charities and churches airtime which they otherwise would not be able to afford. These local advertisers include minority community development groups in Harlem and Queens, plus organizations that feed and clothe the homeless, the Salvation Army, and other worthwhile local endeavors.

If national programmers had the alternative to bypass local stations such as DARS would provide, they would not utilize our services. We would lose 50% of our revenue and worthy local churches and charities would suffer.

The ultimate success of DARS depends on the destruction of the local radio station's reliance on national programs and advertisers. We strongly urge you to oppose digital radio by satellite and support local broadcasting as a force for good in local communities all over the United States.

Very truly yours,

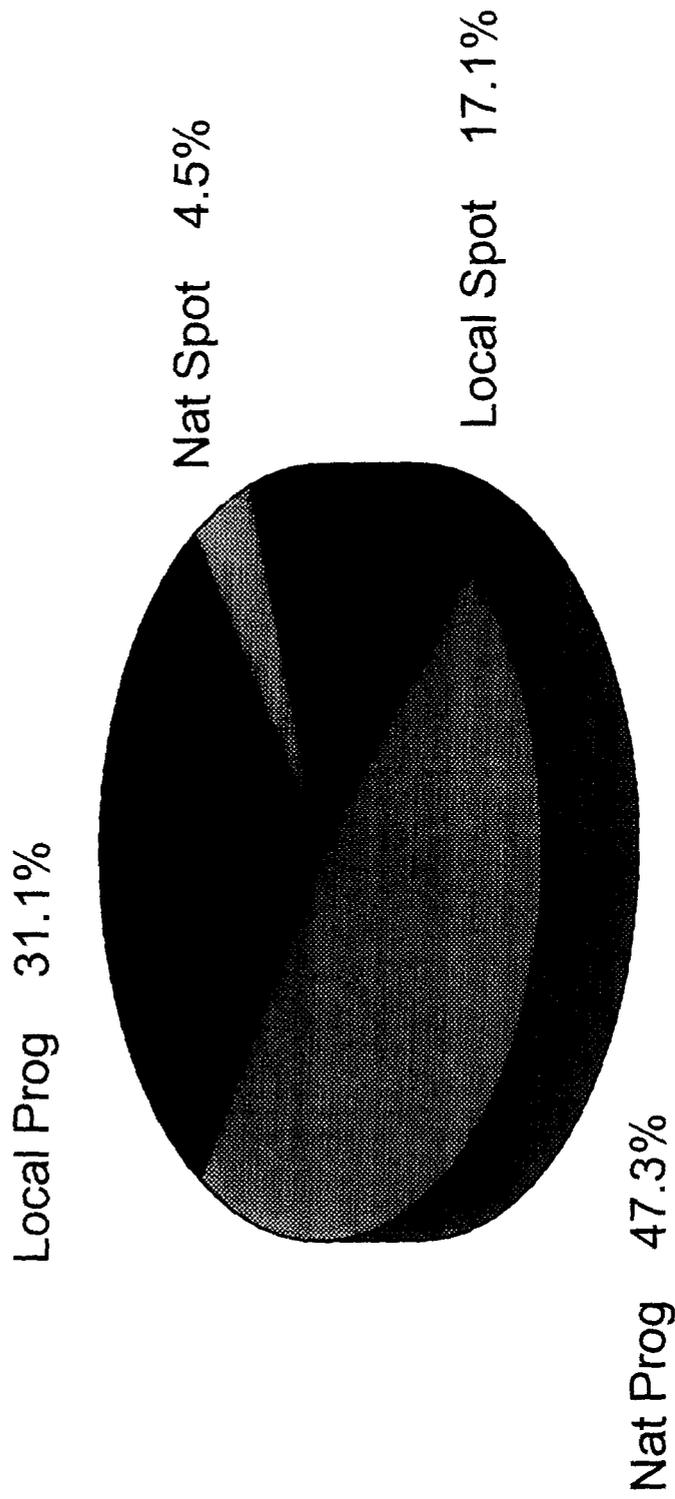
SALEM MEDIA CORPORATION

  
 Joe D. Davis  
 Vice President  
 General Manager

cc: Chairman Reed Hundt  
 Commissioner James Quello  
 Commissioner Andrew Barrett  
 Commissioner Susan Ness  
 Commissioner Rachelle Chong

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# Income by Source WMCA and WWDJ



**MyStar Communications Corporation**

IB 95-91

August 23, 1995

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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF SECRETARY

Commissioner *Rachelle Chong*  
Federal Communications Commission  
1919 M St., NW  
Washington, DC 20554

Dear Ms. Chong:

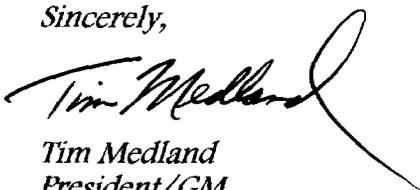
*We represent 3 radio stations in Indiana. We purchased these stations within the last 5 years believing that consolidating three stations under one ownership would offer better service to the local community.*

*Much of our participation in community events makes a difference to the citizens of Indianapolis. We have helped several charities, school systems, encouraged clean up of the city, brought symphony programs to an outdoor venue, and much more.*

*We believe strongly in local involvement. Satellite DAB would not be in the best interest of local broadcasters, because it would make local radio unprofitable by fragmenting radio audiences; therefor, satellite DAB would virtually eliminate local community service and would reduce effectiveness of local advertising.*

*There is no more need for radio service from a national radio network. We feel Satellite radio with it's enormous capital investment presents an unlikely chance of financial profitability as a subscriber based radio service. Competition is already fierce in radio. So, Please don't authorize a new Satellite DAB service (General Docket #90-357).*

Sincerely,



Tim Medland  
President/GM  
WZPL/WTPI/WMyS

TM/pab

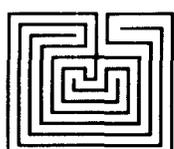
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WTPI-FM / WMyS-AM 1430  
3135 N Meridian St.  
Indianapolis, IN 46208  
Phone: 317-925-1079  
Fax: 317-921-3676

WZPL-FM  
3500 DePaul Blvd  
Suite 1060  
Phone: 317-879-9999  
Fax: 317-879-1433

IB 95-91



**DAEDALIAN**  
TECHNOLOGIES, LTD.

A Technology Brokerage

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September 26, 1995

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OCT 11 1995

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

COMMUNICATIONS DIVISION  
WASHINGTON, D.C.

Dear Commissioner Chong:

An important matter needs to be brought to your attention. Please find enclosed a copy of my recent letter to Chairman Hundt.

Commercial satellite communications is important to all U.S. citizens. The downturn in defense-related jobs is gradually being offset by new commercial space initiatives. One such initiative, the Teledesic project, could provide an estimated 7,500 new jobs to the United States. Unfortunately those jobs could just as easily be realized outside the U.S., depending in part on the timing and nature of your actions.

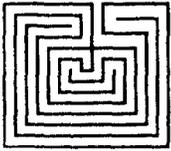
I have specific knowledge regarding at least one potential Teledesic competitor shifting its emphasis from FCC license pursuit to foreign Government licensing. The consequence to that competitor is simply to bypass U.S. demand for its future satcom services. Foreign demand is deemed so large that this cost is thought bearable in exchange for time-to-market and cost advantages gained through circumventing U.S. license processes. If successful, others may follow that example. We in the U.S. cannot in this fashion afford to abandon our current world leadership in space. Similarly, our citizenry cannot afford to be deserted by next generation, *foreign-controlled* satellite communications service providers. National security implications could be at stake. Rural citizens will risk continued ignorance by telecommunications suppliers, lower standards of service, and high telecom costs.

Please lend your support to expeditious approval and licensing of the Teledesic project. Thank you.

Sincerely,

James H. Freidell  
President

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**DAEDALIAN**  
TECHNOLOGIES, LTD.

*A Technology Brokerage*

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OCT 11 1995

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September 25, 1995

The Honorable Reed E. Hundt  
Chairman  
Federal Communications Commission  
1919 M Street, N.W.  
Washington, D.C. 20554

Re: Teledesic Application  
File No. 22-DSS-P/LA-94 (840)  
43-SAT-AMEND-95  
127-SAT-AMEND-95

Dear Chairman Hundt:

It has come to our attention that the Federal Communications Commission recently issued a Public Notice seeking comment on several pending applications for satellite systems. Daedalian Technologies, Ltd. is pleased to submit comments in this proceeding, and would like to bring your attention to Teledesic Corporation, a project seeking to provide global, broadband non-geostationary satellite communications service. Daedalian strongly believes the deployment of a U.S.-based system like Teledesic's will have a tremendously positive impact on the U.S. commercial satellite industry.

Here in the United States, Teledesic will directly address the demand for advanced, digital broadband telecommunications services for millions of Americans in remote and low-density population areas. Recent news accounts underscore the exasperation of Alaskan citizens who cannot get "plain old telephone service," via party line let alone dedicated line or high bandwidth service at any reasonable price despite an average annual income exceeding \$100,000. Future satellite services from geostationary orbit likely will not help these citizens - only non-geostationary satellite services such as that proposed by Teledesic have any hope of providing reasonably affordable broadband communications services to remote regions in Alaska.

In addition, Teledesic's network will enable local telephone companies, network service providers and government authorities around the

The Honorable Reed E. Hundt  
September 25, 1995  
page 2

world to cost-effectively modernize existing communications services. Here in Colorado, an irrationally large segment of the population cannot get broadband communication services. Just 20 minutes outside Denver, in Evergreen, a relatively affluent mountainous suburb, citizens cannot obtain a second line nor ISDN service. The local telephone company, Mountain Bell, a division of U.S. West, will not estimate when ISDN service may be available – such service is too expensive to provide there, so it claims. Business travels of our employees offer other examples. We cannot obtain data services above 4.8 kbps in many Colorado, Wyoming or New Mexico customer sites, except by a long distance telephone call to a major city. Telephone service at one customer location in Florida is so poor that neither facsimile nor reliable data services above 300 bps are practical, long distance or local, apparently due to lack of infrastructure maintenance in that community; there even voice telecommunications are strained.

There is no question that a global broadband satellite system like Teledesic has the potential to better the lives of people worldwide by providing a vast range of advanced communications services regardless of location, improving economic productivity and increasing access to social services. The Canadian government estimates that 15% of their citizens will never obtain wireline telephone services. Since most of this population is located in northern Canada, only a non-geostationary satellite system like Teledesic can offer services comparable to Canadian citizens living in major metropolitan centers. Obviously, problems such as these are much more profound outside North America.

Like other companies involved in the satellite industry, Daedalian Technologies is aware of the importance of continued development and deployment of U.S. satellite systems and, more importantly, the potential these technologies hold in ensuring that the U.S. retains its lead in the increasingly competitive global satellite industry. As a small business, our situation is acute. If applications for innovative global satellite systems such as Teledesic's are not processed in a timely and efficient manner, the U.S. may be risking its lead in these strategically-critical technologies. A pivotal JTEC/WTEC study supported by the National Science Foundation and the National Aeronautics and Space Administration, published in December 1992, highlights how far we in the U.S. are falling behind the Japanese and Europeans in a critical satellite technology germane to our business. Since we are prohibited

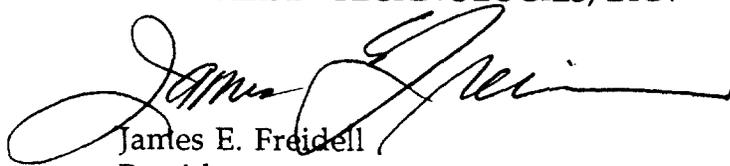
The Honorable Reed E. Hundt  
September 25, 1995  
page 3

from exporting our technology and goods due to national security interests, any foreign effort similar to Teledesic's that does not emphasize U.S. customer demand and hence does not require an application be filed before the FCC, but instead expeditiously gains favorable approval from one or more foreign Governments thereby jeopardizing Teledesic's business prospects, could put Daedalian Technologies and all its U.S.-based competition out of business. Given recent cutbacks in government space and defense programs, a robust private sector satellite industry is ever more vital for maintaining jobs and economic growth in the United States.

We must ensure that important policy implications, such as the economic benefits inherent in innovative satellite systems, are kept at the forefront of discussions. Daedalian Technologies looks forward to your help in expeditiously processing and approving the applications of new and innovative satellite systems, such as the one proposed by Teledesic.

Thank you for your consideration of our views on this matter.

Sincerely,  
DAEDALIAN TECHNOLOGIES, LTD.



James E. Freidell  
President

cc: The Honorable Hank Brown  
The Honorable Ben Nighthorse Campbell  
The Honorable Patricia Schroeder  
The Honorable David E. Skaggs  
The Honorable Scott McInnis  
The Honorable Wayne Allard  
The Honorable Joel Hefley  
The Honorable Dan Schaefer  
Commissioner James H. Quello  
Commissioner Andrew C. Barrett  
Commissioner Rachelle B. Chong  
Commissioner Susan Ness

**FM 102**



**AM 960**

H. Lincoln Zeve  
President / C.E.O.

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October 3, 1995

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OCT 13 1995

Commissioner Rachelle B. Chong  
Federal Communications Commission  
Room 844  
1919 M Street, NW  
Washington, DC 20554

FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON, D.C.

Dear Ms. Chong:

I am again writing to address what I foresee as huge potential problems if the FCC authorizes the use of satellite radio with no restrictions on format or free availability, as it relates to Gen. Docket No. 95-91IB.

As a small radio station, I feel authorizing satellite radio will make it impossible for me as a small station to remain profitable, as it will divide available audience too thinly.

Additionally, the use of satellite radio will have adverse effects on community services provided to local communities and advertisers, as it will reduce my audience share by taking away listeners to national services.

The market is already saturated with sufficient radio stations to satiate the needs of audience listenership. Our competition is stiff enough without additional "cluttering" with satellite stations. Perhaps Korean or other format specific programming is O.K., but not head to head direct competition.

It is my opinion that satellite radio provides no opportunity for diversification of ownership and would have essentially no public interest or minority employment obligations.

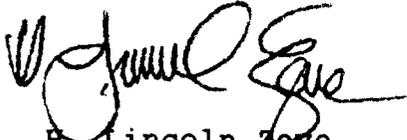
Satellite radio could provide seemingly new radio service to a triflingly small population on local broadcasters, but if approved with no format limitations, with no fee for service (subscription), and is allowed to operate free of regulations, you will see the end of local radio as we know it in smaller communities like mine. Is this what you want? To wreak havoc? I believe it would wreak a national cost of enormous proportions.

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I support in band, on-channel DAB and am not against new technology, provided it is offered to the public more effectively through the existing radio broadcasting system. I urge you to think about all of the negative implications this could have on all radio stations before flippantly authorizing satellite radio.

Regards,

A handwritten signature in black ink, appearing to read "H. Lincoln Zeve". The signature is stylized and cursive, with a large initial "H" and "Z".

H. Lincoln Zeve  
President/CEO

HLZ:sak

cc: National Association of Broadcasters  
Secretary, Federal Communications Commission