



Celeste M. Moy
Vice President
Deputy General Counsel

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MAY 23 1996

FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20541

May 22, 1996

Mr. William F. Caton, Secretary
Federal Communications Commission
1919 M Street, N.W.
Suite 222
Washington, D.C. 20554

DOCKET FILE COPY ORIGINAL

Re: Comments of BET Holdings, Inc. --RM-8784

Dear Mr. Caton:

This letter is to provide notice, pursuant to Section 1.1206(a)(1) of the Commission's Rules, that copies of the enclosed comments were forwarded today to Chairman Reed Hundt and to each of the other individuals identified as receiving copies. Each of the foregoing also received a copy of this letter. Two copies of these comments are enclosed for inclusion in the above-referenced docket.

If you have any questions regarding the matter, please contact me.

Very truly yours,

Celeste M. Moy
Celeste M. Moy

Enclosure

CMM/dhk

cc: Chairman Reed E. Hundt
Commissioner James H. Quello
Commissioner Rachelle B. Chong
Commissioner Susan Ness
Jackie Chorney, Legal Assistant to Chairman Hundt
Suzanne K. Toller, Legal Advisor to Commissioner Chong
Mary P. McManus, Legal Advisor to Commissioner Ness

Black Entertainment Television, Inc.

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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20054

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MAY 23 1996

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

In the Matter of Amendment of Parts 2 and 15 of the Commission's Rule to Permit Use of Radio Frequencies Above 40 Ghz for Radio Applications.

Petition of Sky Station International, Inc. for Amendment of the Commission's Rules to Establish Requirements for a Global Stratospheric Telecommunications Service in the 47.2-47.5 Ghz and 47.9-48.2 Ghz Frequency Bands

RM-8784

COMMENTS OF BET Holdings, Inc.

BET Holdings, Inc., (BET) submits these Comments in support of the Petition of Sky Station International, Inc. ("Sky Station") to establish a new Global Stratospheric Telecommunications Service ("GSTS") in the 47.2-47.5 Ghz and 47.9-48.2 Ghz Frequency Bands. BET urges the Commission to promptly implement appropriate rules for the implementation of GSTS so that this service can be made available to the public as soon as possible. As explained below, the telecommunications service offered by GSTS will serve the public interest by providing the country's manufacturers of goods with a superior method of exchanging and accessing critical information. BET believes, therefore, that GSTS will lead not only to improved communications across the globe, but will also provide an inexpensive alternative to the need to hardwire computers in order to gain access to the World Wide Web and other Internet and digital services. This is a fundamental breakthrough in advancing global telecommunications.

BACKGROUND AND STATEMENT OF INTEREST

BET is the parent company of the following BET Cable Networks: Black Entertainment Television, BET On Jazz, and BET Action Pay-Per-View. BET's Cable Networks provide cable operators and other multichannel video programming distributors originally produced and syndicated programming services which target the interests and concerns of African-Americans. BET's 24 hour programming services are available to more than 40 million cable subscribers. BET is the only publicly traded media company that targets black consumers. On February 1, 1996, BET and Microsoft Corporation announced that they will form a joint venture to develop and deliver compelling interactive entertainment and information to help ensure that black and urban consumers are full participants in the information superhighway.

PUBLIC INTEREST BENEFITS OF GSTS

We believe that the GSTS will be extremely valuable to the world public at large through provision of affordable portable broadband Internet and related digital communications. There is nothing else comparable to the GSTS in the global broadband Internet market. Its low cost and high capacity are remarkable attributes that are the direct result of the innovative placement of stationary platforms in the stratosphere that has not before been practical. The ability of the GSTS to expand broadband computer communications today is invaluable to both the worldwide economy to and individual lives and should be the next paradigm for broadband communications. BET is excited by the prospect of global wireless Internet and other digital communications at an affordable price and applaud Sky Station's vision and technology to truly provide a global information and technology infrastructure and universal low-cost service.

BET will specifically benefit from GSTS because it will offer BET an opportunity to distribute its broad range of engaging content, including Internet on-line programming, interactive television and CD-ROM titles, into global markets.

SUMMARY

There is an immediate need for GSTS to take broadband communications into the next paradigm. To do this on a global basis and at low costs is truly a remarkable achievement. BET urges expeditious approval of the GSTS applications to provide this revolutionary new service.

Respectfully submitted,

BET Holdings, Inc.

A handwritten signature in black ink, appearing to read "Robert L. Johnson", is written over the printed name and title below. The signature is stylized and somewhat illegible due to overlapping loops.

Robert L. Johnson
Chairman and CEO