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July 9, 1997

VIA HAND DELIVERY

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

IB 95-91

Dear Mr. Caton

On behalf of Mt. Wilson FM Broadcasters, Inc., there is herewith transmitted an original and nine copies of its Supplement to Comments of Mt. Wilson FM Broadcasters, Inc. on Further Notice of Proposed Rulemaking.

It is respectfully requested that the Mt. Wilson "Supplement" be associated with the Mt. Wilson Comments previously filed.

Sincerely

Robert B. Jacobi
Robert B. Jacobi

RBJ:btc

Enclosure

DS1/38120-1

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

BEFORE THE

Federal Communications Commission

In the Matter of 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

SUPPLEMENT TO COMMENTS OF MT. WILSON FM BROADCASTERS, INC. ON FURTHER NOTICE OF PROPOSED RULEMAKING

Mt. Wilson FM Broadcasters, Inc. (hereinafter "Mt. Wilson") submitted Comments in the above referenced proceeding on June 13, 1997. The Mt. Wilson Comments referenced the existence of "spot beam" technology which would allow a DARS licensee to provide local-oriented programming to a specific market. Mt. Wilson urged (among other arguments) that if the Commission permits terrestrial repeaters for DARS licensees, the Commission should adopt rules which prohibit terrestrial repeaters from transmitting spot beam programming. The basis for the Mt. Wilson argument was that the Commission itself recognized the possibility that DARS could adversely affect the viability of terrestrial radio; that the Commission specifically cited as an incentive for terrestrial broadcasters to maintain viability an emphasis on local programming; but that permitting DARS licensees through the use of terrestrial repeaters to carry spot beam programming would provide the capability of destroying those "incentives."

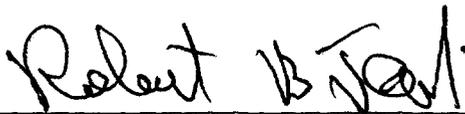
The singular purpose of this "Supplement" is to bring to the Commission's attention an article from the publication Broadcast Electronics, "Washington Update" -- wherein the subject of "spot beams" and the impact on terrestrial broadcasters is discussed.

Spot beam programming is an existing reality; the authorization of terrestrial repeaters to distribute spot beam programming will exacerbate the acknowledged DARS potential for adversely affecting terrestrial radio -- at a minimum, predictably resulting in a substantial decrease in the number of terrestrial radio facilities.

Pragmatically, defunct stations (particularly standard broadcast stations) are not likely to be resurrected. Absent the adoption of appropriate rules as a condition precedent to the authorization of terrestrial repeaters, the damage to terrestrial broadcasters will have become irreparable.

Respectfully submitted,

By:



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Counsel for Mt. Wilson FM Broadcasters,
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Dated: July 9, 1997



WASHINGTON

Update



BY ANDY BUTLER

Consulting Engineer, Public Broadcasting

Read A Good Book Lately?

It sounds strange but I'm urging my friends in radio to take a weekend off and read a book. The book I'm recommending is *Defining Vision* by Joel Brinkley. It accurately chronicles the difficult and convoluted process the Television industry just experienced in developing the ATSC Digital Television System and getting it adopted by the FCC. Urging radio broadcasters to read a book about television sounds bizarre but I think getting enough of the right people to read that book may mean the difference between life and death for radio broadcasting as we know it in the US.

The book is a cross between a who's who in US technology and a basic training manual in Techno Politics as practiced in the US. You will find yourself alternately shaking your head in disbelief and laughing out loud at events and people that seem utterly ridiculous. The fact is that all of the events in the book are true and the author is actually conservative in many cases.

Why is this tale important? Used properly it is a guidebook for fostering fundamental changes in broadcast technology. Radio needs to learn these methods to develop and implement a digital alternative to traditional broadcasting. We already know several reasons for desiring this change; better coverage at lower power levels, no multi-path distortion, noise-free reception, better frequency response and dramatically improved signal to noise performance. These were just joined by another compelling force.

On April 1 the FCC awarded two Digital Audio Radio Service (DARS) satellite licenses to Satellite CD Radio and American Mobile Radio.

On the surface this may not seem like much of a threat but there are several things to consider. Each licensee will offer 30 to 40 CD quality program channels. They are permitted to use "spot beams" on

their multiple satellites to direct particular programming (or commercials) to given geographic regions. Because the services are subject to interruption in urban areas from buildings, bridges and other obstructions, both companies will be allowed to install terrestrial based boosters or repeaters on an unlimited basis. There is nothing in the rules that prohibits feeding at least some amount of programming directly to these transmitters effectively making them local, over-the-air stations.

The FCC did not limit the two companies to subscription only service. They will be free to raise revenue either by subscription or by selling spots. One company has indicated that they will pursue regional and national advertising sales at least on non-music channels. The subscription fee for full time music service will be less than \$10 a month. The receivers will be very similar to the Eureka receivers being sold in Europe, Canada and many other countries. Due to market size, they are expected to sell for about \$100.

All of these factors taken together profile a service that could give local radio some real competition. Radio needs to fight back. Some of radio's smartest people need to study the Brinkley book, make the commitment to create a viable digital alternative for existing terrestrial broadcasting and then work it through the Washington system. It's probably not too late but earlier would certainly have been easier.

EXCITER

Re-Engineering High Power FM

While many RF manufacturers have left it unattended, Broadcast Electronics has invested considerable resources improving high power FM transmission equipment. This important product category received an improved set of technical features this Spring when BE introduced the T-Series line of high power FM transmitters.

To look at them, there is little difference from BE's previous line of HPFM transmitters, but the real change is inside, where it counts. The new T-Series remains the most cost efficient and reliable line of transmitters on the market. And they maintain the same standards for audio quality and long life BE has become recognized for.

The most obvious improvement is a new, advanced transmitter controller. Capable of monitoring virtually every transmitter function from a single, reliable assembly, the new controller features three serial ports for direct communication connections, and can accept future technical improvements via simple software changes, rather than replacing the entire unit.

The new T-Series also features a new solid state IPA. This new 500 watt MOSFET IPA comes from the FM RF amplifier in BE's highly successful solid state FM transmitter line and has years of field experience and trouble free operation behind it.

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