

October 19, 2017

Via Electronic Filing

The Honorable Ajit Pai, Chairman
The Honorable Mignon Clyburn, Commissioner
The Honorable Michael O’Rielly, Commissioner
The Honorable Brendan Carr, Commissioner
The Honorable Jessica Rosenworcel, Commissioner

Federal Communications Commission
445 12th Street, SW, 8th Floor
Washington, DC 20554

*Re: In the Matter of Authorizing Permissive Use of the “Next Generation” Broadcast
Television Standard, GN Docket No. 16-142*

Dear Chairman Pai and Commissioners Clyburn, O’Rielly, Carr, and Rosenworcel:

As a signatory to the Next Generation TV petition that launched the above-captioned proceeding, the Consumer Technology Association (CTA)™¹ reiterates our support for the Commission’s efforts to accelerate the nation’s transition to Next Generation TV service (“Next Gen TV”) by allowing broadcasters and manufacturers to implement the ATSC 3.0 television transmission standard on a voluntary, market-driven basis. CTA’s membership includes television manufacturers that sell approximately 40 million TVs in the United States each year.

¹ The Consumer Technology Association (CTA)™ is the trade association representing the \$321 billion U.S. consumer technology industry, which supports more than 15 million U.S. jobs. More than 2,200 companies – 80 percent are small businesses and startups; others are among the world’s best known brands – enjoy the benefits of CTA membership including policy advocacy, market research, technical education, industry promotion, standards development and the fostering of business and strategic relationships. CTA also owns and produces CES® – the world’s gathering place for all who thrive on the business of consumer technologies. Profits from CES are reinvested into CTA’s industry services.

CTA believes that more certainty is needed regarding the modulation system to be used by broadcasters for their ATSC 3.0 transmissions. Without a defined modulation standard for broadcasters' ATSC 3.0 transmissions, there is a very real possibility of chaos in the marketplace and consumer rejection of ATSC 3.0. Unlike in the wireless context, where a small handful of nationwide carrier-providers are able to dictate to phone manufacturers what technology to incorporate into devices, no single broadcaster or broadcast group has the requisite market power to dictate to television manufacturers what technology to incorporate into television sets.

Fortunately, the framers of ATSC 3.0 specified a robust and extremely flexible new modulation system – namely A/322 – that is optimized to deliver all the benefits of Next Gen TV to fixed, mobile and handheld receivers. In designing A/322, the Advanced Television Systems Committee took into account broadcasters' needs for flexibility and future-proofing. As a result, more than 10,000 different emission parameters are possible with the waveform and coding choices available within A/322.

As CTA recommended in Reply Comments in this proceeding,² the Commission should recognize that A/322 is an important aspect of ATSC 3.0 that will further facilitate the transition to Next Generation broadcasting. In addition, CTA also recommends that the Commission should encourage this advanced modulation method for television services to be displayed on mobile, portable, and fixed devices; such recognition will give device manufacturers more certainty and instill consumer confidence in new ATSC 3.0-enabled television receivers, thus further supporting the voluntary transition. Accordingly, to ensure the successful launch and rapid adoption of Next Gen TV, CTA urges the Commission to incorporate into its rules the two critical components of ATSC 3.0 – namely, ATSC A/322:2016 “Physical Layer Protocol” and ATSC A/321:2016 “System Discovery & Signaling.”

CTA and its television manufacturer members are eager and excited to be an integral part of the nation's transition to Next Gen TV, and we look forward to working with the Commission to ensure the transition's success for American TV viewers. Disenfranchising viewers is a real concern and would be an unintended consequence of the Commission failing to recognize that A/322 is an important aspect of ATSC 3.0 that will further facilitate the transition to Next Gen TV broadcasting.

For the reasons stated above, CTA believes that Next Gen TV success can only be achieved if manufacturers and the American public have certainty that the television sets and other reception devices they manufacture (in the case of the former) or purchase (in the case of the latter) are capable of adequately receiving ATSC 3.0 signals.

² See Reply Comments of the Consumer Technology Association, GN Docket No. 16-142, at 5 (filed June 8, 2017).

Respectfully submitted,

/s/ Julie M. Kearney

Julie M. Kearney

Vice President, Regulatory Affairs

Brian Markwalter

Senior Vice President, Research and Technology

Consumer Technology Association (CTA)TM

1919 Eads Street

Arlington, VA 22202

CC:

Alison Nemeth
David Grossman
Brooke Ericson
Nirali Patel
Kate Black
Michelle Carey
Nancy Murphy
Martha Heller
Steven Broeckaert
Brendan Murray
Evan Baranoff
Kathy Berthot
Susan Aaron
Kevin Harding

F. Mario Trujillo
Martin Doczkat
Mark Colombo
Barbara Pavon
Suzy Rozen Singleton
Daryl Cooper
Sarah Burgart
Will Schell
Walter Johnston
Antonio Lavarello
David Konczal
John Gabrysch
Evan Morris
Kim Matthews