

Before the
Federal Communications Commission
Washington, D.C. 20554

In the Matter of)
)
International Bureau Seeks Comment on)
Implementation of Section 25.281(b)) IB Docket No. 12-267
Transmitter Identification Requirements for)
Video Uplink Transmissions)

REPLY COMMENTS OF ACCELERATED MEDIA TECHNOLOGIES INC.

Accelerated Media Technologies Inc. (AMT) hereby replies to the only other Comment filed in this proceeding, that of the National Cable & Telecommunications Association (NCTA).¹ NCTA offers no legitimate rationale for its requested two-year extension of the present September 3, 2017 deadline for the implementation of the Section 25.281(b) transmitter identification requirements for digital video uplink transmissions.² The International Bureau (Bureau) should retain the present implementation timeline.

DISCUSSION

NCTA, which members include program distributors who must comply with the new Section 25.281(b) requirements, proffers two reasons that the September 3, 2017 deadline should be extended for two additional years: 1) the state of the earth station modulator market; and 2) the life cycle of modulator equipment. Neither reason is accurate nor compelling.

¹ *Comprehensive Review of Licensing and Operating Rules for Satellite Services*, Comments of the National Cable & Telecommunications Association, IB Docket No. 12-267 (filed June 30, 2016) (NCTA Comments).

² *See International Bureau Seeks Comment on Implementation of Section 25.281(b) Transmitter Identification Requirements for Video Uplink Transmissions*, Public Notice, DA 16-367 (rel. April 6, 2016) (Public Notice) (detailing grant of blanket waiver extending deadline).

A. *The State of the CID Technology Market is Robust.*

NCTA claims that a market for external modulators has not developed and that its members who use older equipment “cannot obtain the external hardware necessary to upgrade.”³ This is not the case; external hardware is available at reasonable cost.

As detailed in AMT’s Comments,⁴ AMT currently offers two devices in the U.S. that allow operators to meet the updated Automatic Transmitter Identification System (ATIS) requirements simply and at reasonable cost. Both are supplemental, or external, modulators, the type that NCTA states are what the Commission contemplated when it adopted the new rule. Specifically, the CID Passport Modulator and the Teamcast CID Decoder are available. Another distributor, Newtec, markets a similar technology.⁵

NCTA additionally claims that there is a shortage of embedded modulator equipment, meaning equipment that would replace older equipment.⁶ Again, as AMT’s Comments detail, there are a large number of manufacturers offering compliant replacement equipment.⁷ There is no shortage. All manufacturers making modulators (or encoders containing modulators) today are building them with CID to meet FCC rules, and have been doing so for several years. The Satellite Interference Reduction Group (SIRG), the global industry organization that focuses on combating and mitigating radio frequency interference for the satellite industry, provides the following information on its website on CID availability:

³ NCTA Comments at 3.

⁴ *International Bureau Seeks Comment on Implementation of Section 25.281(b) Transmitter Identification Requirements for Video Uplink Transmissions*, Comments of Accelerated Media Technologies Inc., IB Docket No. 12-267 (filed June 30, 2016) (AMT Comments).

⁵ *Id.*

⁶ NCTA Comments at 3.

⁷ *See* AMT Comments at Attachment A.

The roll-out of DVB-CID has already begun and the [Space Data Association](#) (SDA) has a beta CID Database online for members, which will soon be available to all operators.

The major operators have detection systems in place and most have completed their own internal work on adding CID to all transmissions. **95% of all Modulators and an ever increasing number of DSNG Encoders (in excess of 50% of total market) now have DVB-CID available.**⁸

The SIRG also provides a list of dozens of CID-ready products, which it states is “not necessarily exhaustive.”⁹

Equipment clearly is available. For these reasons, the Commission precedent on which NCTA relies – *i.e.*, lack of available equipment – does not apply.

Additionally, retaining the 2017 deadline will not result in “waste and stranded investment,” as NCTA claims.¹⁰ As AMT noted in its Comments, the technology offered by it and Newtec does not require replacing equipment, but rather can be added to current equipment.¹¹ Retaining the current timeline will encourage quicker adoption of the new digital CID rules, for which equipment manufacturers have redesigned equipment and for which the satellite industry has been preparing for years.

B. An Additional Two Year Extension is Unnecessary.

NCTA suggests that two additional years – to September 3, 2019 – would be a sufficient amount of time for its members to either replace current equipment with compliant equipment and/or to allow the external modulator market to develop. However, NCTA provides no support for these claims. In fact, as discussed above, equipment manufacturers already have redesigned equipment to meet the new rules, and that equipment is being marketed and adopted.

⁸ <http://satirg.org/working-groups/carrier-id/> (emphasis added).

⁹ <http://satirg.org/dvb-cid/cid-ready-products/>.

¹⁰ NCTA Comments at 6.

¹¹ AMT Comments at 2.

NCTA additionally suggests that the “external modulator market [] may never adequately support industry requirements.”¹² NCTA again provides no support for this theory, which is not valid based on AMT’s understanding of the current market.

CONCLUSION

The Bureau should retain the present timeline, up to September 3, 2017, for the required implementation of the Section 25.281(b) transmitter identification requirements for video uplink transmissions.

Respectfully submitted,



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¹² NTCA Comments at 4.