

time, can impose a minimum operating requirement.<sup>14</sup> At present, however, we do not believe that there is a need to impose such a requirement.

**III. SONY SUPPORTS THE COMMISSION'S DECISION NOT TO IMPOSE AN ATV PRODUCTION STANDARD.**

As noted in the Commission's Third Report & Order, Sony's Comments filed in response to the Further Notice discuss the importance of establishing a single U.S. ATV production standard. Third Report & Order, ¶ 60. Sony wishes to emphasize that we fully agree with the Commission's decision not to impose an ATV production standard.<sup>15</sup> Sony has never been under the illusion that the FCC should be involved in setting television production standards. Our Comments apparently engendered an impression among some that we were, in fact, advocating a new participation by the FCC in establishing such a standard for ATV.<sup>16</sup> We regret this. Since 1983, Sony has fully participated in ATSC and SMPTE, the U.S. standards making committees for HDTV

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<sup>14</sup> The Commission has deferred establishing a minimum number of hours that broadcasters must air "true" ATV programming. Third Further Notice ¶ 76. The Commission can consider the implications of ancillary services when it later addresses this issue.

<sup>15</sup> See Sony Comments, p. 5, 8-26.

<sup>16</sup> See AT&T Reply Comments, dated August 17, 1992, pp. 5-6.

production, and we believe that these committees are the appropriate bodies for such work.

We do, however, wish to emphasize that our Comments on the ATV production standard are highly pertinent to the questions raised by the Commission in the Further Notice. We felt that there was not a sufficient understanding about the daunting challenges facing our industry in bringing ATV equipment costs down to a level that will ensure the swift implementation of the ATV broadcasting service as envisioned by the FCC. As a manufacturer with a decade of extensive experience in the development and production of a broad line of ATV studio origination equipment, we believe we have realistic and substantive information to impart to the industry. This experience, coupled with our pro-active involvement in the long and complicated HDTV production standards process in the U.S., led us to make the frank and comprehensive comments that we did.

In summary, Sony fully endorses the Commission's decision not to impose an ATV production standard. At the same time, Sony believes that unless the industry agrees upon a single production standard, production volumes will remain relatively low and the benefits of economies of scale will not emerge. We refer all who now have a deep interest in the issues relating to the actual implementation of an ATV broadcast service to study Sony's Comments carefully on the issue of the intimate

relationship between an accepted ATV production standard and the costs of the equipment required to implement that standard.

CONCLUSION

Sony believes that the successful implementation to ATV depends upon making ATV receivers and high quality ATV programming available for consumers. To make ATV widely available, ATV equipment manufacturers, producers and broadcasters need the flexibility to respond to the marketplace demands for ATV equipment and services. If the Commission overly regulates the manufacture of ATV equipment or the use of ATV channels at this early juncture, the marketplace for ATV equipment and services may not fully develop. For this reason, Sony urges the Commission not to impose strict manufacturing requirements or to prevent broadcasters from maximizing the capabilities of their ATV channels.

Respectfully submitted,  
SONY CORPORATION OF AMERICA

By: Robert E. Dillon  
Robert E. Dillon

Dated: January 7, 1993

CERTIFICATE OF SERVICE

I, Gayle Kosarin, certify that I have this 7th day of January, 1993, sent by hand-delivery, a copy of the foregoing Comments of Sony Corporation of America to:

- \*Chairman Alfred C. Sikes  
Federal Communications Commission  
1919 M Street, N.W.  
Room 814  
Washington, D.C. 20554
- \*Commissioner James H. Quello  
Federal Communications Commission  
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Room 802  
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- \*Commissioner Sherrie P. Marshall  
Federal Communications Commission  
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- \*Commissioner Andrew C. Barrett  
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Gayle Kosarin

\* By Hand