



November 15, 2019

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street SW
Washington, DC 20554

Dear Ms. Dortch:

MobiTV writes today to express support for the 5G Plus Plan, and in particular the proposal that cable operators be given options to migrate their video transport to fiber when C-Band spectrum is repurposed for 5G. In a recent filing, ACA Connects presented, as one possible transition option for cable operators, connecting via fiber to receive video from a terrestrial managed video transport provider.¹ The filing identifies MobiTV as a provider that offers such service today and that could expand its operations to accommodate cable operators that choose this transition option under the 5G Plus Plan. MobiTV confirms that it is ready, willing and able to serve in this capacity. We also find, based on our experience in this market, that ACA Connects has reasonably estimated the costs of providing a managed video service via fiber to cable operators across the country.

Established in 2000 and headquartered in Emeryville, Calif., MobiTV provides an end-to-end app-based IPTV platform through a software as a service (SaaS) model that enables cable operators to deliver white labeled advanced pay TV services to their end users via fiber connectivity as an alternative to their legacy satellite based head ends. The National Cable Television Cooperative (NCTC) and the NRTC, both of which represent smaller operators, have endorsed MobiTV's offering as an alternative to traditional video service. MobiTV has entered contracts with over 100 operators in the U.S, who represent a current footprint of over 3,000,000 subscribers. Over half of the signed operators are commercially deployed in their respective markets, many of which span several states and designated market areas (DMAs).

The SaaS-based nature of the MobiTV Connect Platform, which is depicted in the enclosed diagram, allows operators to leverage MobiTV's centralized headend as a replacement to their legacy TV service, with the option to completely turn down their existing headend. Having obtained national transport/ingest rights from all major US based content providers, MobiTV is able to distribute its entire content lineup of 375 national linear feeds and corresponding video-on-demand (VOD) assets to all operators leveraging the service. Operators are required to obtain the necessary content rights, either directly or through a cooperative such as NCTC or NRTC, and connect directly via dedicated fiber to one of MobiTV's headend locations in Sacramento, Calif., or Atlanta, Ga.

¹ See Letter From Ross Lieberman, ACA Connects, to Marlene H. Dortch, Secretary, FCC, GN Docket No. 18-122 (filed Nov. 15, 2019).

The platform provides operators with white labeled, fully branded apps, across commercial and managed streaming devices (such as streaming set-top boxes and sticks, connected TVs, gaming consoles, phones, tablets and browsers) with full compliance of all in-home content rights enforced. All video is protected with level 1 DRM to satisfy content providers' security requirements. Subscribers enjoy advanced features such as startover, lookback, nDVR, personalization and voice control with the MobiTV-powered service.

MobiTV has the operational capability to provide this advanced IPTV service to any operator that is connected via fiber to our data center directly or through regional POPs of aggregated fiber connectivity. When the necessary fiber connectivity is in place, an operator can connect to the MobiTV platform quickly and easily and without any upgrade to its headend, because the service is delivered over the operator's broadband facilities. Accordingly, MobiTV is a viable option for cable operators, including in rural areas, that seek a fiber-based solution for video transport as a replacement for the C-Band.

We appreciate the opportunity to discuss MobiTV's innovative video solutions that provide terrestrial alternatives to traditional video transport via satellite. Please direct to the undersigned any questions regarding this filing.

Sincerely,



Bill Routt
President and COO

Enclosure

MobitV Connect Platform

