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Before the  
Federal Communications Commission  
Washington, DC 20554

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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

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In the matter of: )  
)  
Amendment of the Rules Relating to )  
Permissible Uses of the Vertical )  
Blanking Interval of Broadcast )  
Television Signals )

MM Docket No. 92-305

Reply Comments of Mitsubishi Consumer Electronics America, Inc.

Mitsubishi Consumer Electronics America, Inc. ("MCEA") hereby replies to the comments submitted by other parties in response to the Commission's proposal to amend the rules governing use of the vertical blanking interval ("VBI") of television broadcast signals.

The comments were all in support of the basic thrust of the proposals and almost all urge expeditious adoption of a final order. There are some relatively minor issues raised about actual implementation. These issues deal with optional extended services in Line 21 field 1 and 2 and their relationship to each other. Therefore we feel that they are beyond the scope of the current proceedings. 1/ MCEA continues to think that the EIA Recommended Practice for Line 21 Data Services for NTSC ("RP 608") draft document satisfactorily addresses all these issues.

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1/ The National Captioning Institute ("NCI") renewed its request for definition of "text" and "extended data service" and their relationship to each other, but the proposed definitions are different from previous filings.

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Television receivers are not required to implement field 2 decoding capability. Any restriction or reduction in flexibility to implement these emerging new services would make them less attractive to broadcasters. Without their support, receiver manufacturers will be less inclined to build this capability into their products. This would clearly not be in the public interest.

The National Captioning Institute ("NCI") has also raised the issue of adverse impact EDS data insertion may have on the "appear time" of captions. This issue is no different from the insertion of text in line 21 field 1. MCEA agrees that the timing of captions in relation to the program material is important. We also believe that any delay could be kept to the minimum with good practice. Again the RP 608 document addresses and deals with this issue. Under no circumstances would the accumulative delay approach what is currently experienced in live captioning.

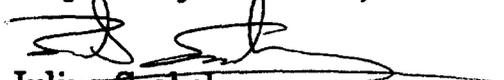
In response to an issue raised by EEG Enterprises ("EEG") relative to the Code table in RP 608, it is true that the codes for field 2 are different from field 1, but this was a conscious decision by the Committee early in the proceeding in order to aid backward compatibility and reliability in case of inadvertent field flipping which can occur in practice. While all products manufactured after July 1, 1993, will have decoding capability in accordance with the current rules and regulations, there will be some products introduced with line 21 field 2 decoding capability in accordance with RP 608. The fact that other decoding circuits already have line 21 field 2 decoding capability insofar as the hardware is concerned is good news, since the necessary software to meet RP 608 is a relatively minor

implementation issue. Nevertheless, it is an indication of future availability of products with field 2 decoding capability.

Finally, a brief comment on some issues raised by the Association for Maximum Service Television, Inc. ("MSTV"). While MSTV supports the use of Line 21 Field 2, it raises the question of potential for interference with Line 22. We, along with other experts in the field, think that this concern is not warranted. Indeed, other comments filed by A.C. Nielsen Company, a frequent user of Line 22 concurs. We fully agree with MSTV that efficient use of the vertical blanking interval is in the best interest of all interested parties, but find its suggestion to designate "text" along with "captioning" a primary service contradictory. RP 608 is founded on the principle of maximum bandwidth efficiency. Any reduction in flexibility could be contrary to this principle. However, to insure the most efficient and diverse use of this finite medium, the Commission may want to adopt language to insure that only new services make use of the media and no simulcasting of the information in field 1 be allowed.

We continue to strongly support the Commission's proposals on both the potential uses of line 19 and line 21 field 2 and urge that the rule changes be adopted expeditiously.

Respectfully submitted,

  
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