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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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 THE CONSUMER ELECTRONICS GROUP
OF THE ELECTRONIC INDUSTRIES ASSOCIATION

The Consumer Electronics Group of the Electronic Industries Association ("EIA/CEG") hereby replies to the comments submitted by other parties in response to the above-captioned Notice of Proposed Rule Making ("Notice").^{1/} The first-round comments reflect broad and enthusiastic support for the Commission's proposals to alter the rules governing use of line 19 and line 21, field 2, of the vertical blanking interval ("VBI").

More than a dozen parties filed comments in response to the Notice. Some of these parties were more interested in line 19 than line 21; others were more interested in line 21. What is significant, however, is that every commenting party expressed support for the proposals embodied in the Notice. Moreover, virtually every

^{1/} Amendment of the Rules Relating to Permissible Uses of the Vertical Blanking Interval of Broadcast Television Signals, 8 FCC Rcd 90 (1992).

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party supported the Commission's intention to adopt the new rules expeditiously. On this record, the Commission can and should adopt a final order without hesitation.

Despite the broad consensus on the desirability of the proposed uses of lines 19 and 21 and on the need for prompt action by the Commission, a few, relatively minor points require a brief discussion.

First, on the question of proposed definitions for "text" and "extended data service" ("EDS"), a clear majority of parties agreed that no such definitions are necessary.^{2/} But the National Captioning Institute ("NCI") renewed its request to have these terms defined and to secure priority for "text" in relation to EDS. In contrast to its earlier position,^{3/} NCI has now proposed to define "text" as "information that may or may not be related to a given television program's aural information, but is intended to be displayed as written information on a television screen

^{2/} See Comments of The WGBH Educational Foundation ("WGBH") at 2 (no need for further clarification); Comments of Thomson at 2 (same); Comments of Capital Cities/ABC at 2 n.1 (same); Comments of Mitsubishi at 2 ("[l]et the marketplace decide which service delivers the most value"); Comments of EIA/CEG at 6 (NCI's proposed definitions are unnecessary and misleading) [Unless otherwise noted, all filings referenced herein as "Comments" were filed on or about Mar. 1, 1993.]

^{3/} See Comments of NCI, RM-8066 (Sep. 22, 1992). Six months ago, NCI maintained that "'text' means caption-related text."

in more or less real time as it is transmitted."4/ NCI provided no explanation why some non-caption information (text) should be given priority over other non-caption information (EDS),5/ and EIA/CEG is unable to imagine any reason why such priority should be awarded.6/ In this regard, it is noteworthy that no text providers participated in the work of EIA's Television Data Systems Subcommittee (although they were specifically encouraged to do so), and none filed comments in response to the Notice.

Moreover, it should not be forgotten that receivers are not required to incorporate the capability of decoding field 2 information. It is EDS, not text, that has created the enthusiasm for support of field 2, at least on

4/ Comments of NCI at 5 (emphasis added).

5/ Indeed, the EDS data are more likely than text to be program-related, and they are more likely to be intended for immediate viewing (like captions, but unlike text, EDS data will be displayed without displacing the program video).

6/ One party has supported NCI's previous position, asserting that "[d]esignating 'captioning' and 'text' services as the primary uses for line 21, field 2 while permitting the secondary use of line 21, field 2 for 'external [sic] data service information' will help ensure that line 21, field 2 is used primarily for enhanced closed captioning services" Comments of Association for Maximum Service Television ("MSTV") at 5. No one, however, disputes that captions should be given priority in use of line 21, field 2. The question is whether text should be given precedence over other data services. MSTV's reasoning does not support any such distinction.

the part of several of the leading participants in the process. To assign EDS a tertiary status (behind captions and text), as NCI proposes, is likely to make the field 2 service less attractive to broadcasters and to receiver manufacturers, thereby reducing potential interest in, and support for, field 2 services. The best way to encourage support of field 2 capabilities by broadcasters and by receiver manufacturers -- including the enhanced captioning support that will result -- is to avoid any prioritization of field 2 data other than priority for captioning.^{7/}

NCI has also expressed a concern that insertion of EDS data may adversely impact the "appear time" of captions on field 2.^{8/} EIA/CEG believes the issue of synchronization between program and caption material is important and warrants careful attention by encoder manufacturers, caption providers, and programmers of text and EDS data, but this does not require revision of the rules proposed by the Commission. The line 21 encoding equipment used today

^{7/} Incidentally, EIA/CEG agrees with MSTV that "space within the vertical blanking interval should not be used inefficiently." See MSTV Comments at 5. To this end, the rule proposed by the Commission properly includes a Note specifying that "[t]he signals on Fields 1 and 2 shall be distinct data streams, for example, to supply captions in different languages or at different reading levels." Notice, 8 FCC Rcd. at 93 (Appendix A, proposed § 73.682).

^{8/} Comments of NCI at 2-3.

inserts a one-frame delay; as NCI states, an EDS inserter for field 2 introduces a two-frame delay. Because delays can be cumulative, it is important for all concerned to take these factors into account -- as the draft of Recommended Practice for Line 21 Data Services for NTSC ("EIA-608") already specifies -- to keep delays to a minimum.^{9/} Additional regulatory requirements (particularly when phrased imprecisely, as in the case of NCI's proposal that text and EDS not "noticeably offset" the times at which captions appear) are not needed.

A brief comment is warranted in response to the observation of EEG Enterprises ("EEG") that there is some divergence in the decoder circuitry being incorporated into TVs and VCRs for reception of field 2 data.^{10/} It is apparently true that some early product designs for caption-capable receivers were based on the expectation that precisely the same code table would be used for fields 1 and 2, while others were based on the working draft of EIA-608, which includes some changes for field 2 applications.^{11/} Such minor transitional difficulties are inherent when

^{9/} In any event, these delays will be much shorter than those inherent in real-time captioning.

^{10/} Comments of EEG at 2-3.

^{11/} This approach makes it easier for the decoder to distinguish between field 1 and field 2, resulting in more rugged and reliable service in both.

receivers are being designed at the same time that standards are being formulated, and before regulations have been adopted. But this does not require any change in the rules proposed in the Notice; EEG does not itself propose any. What really matters -- and on this EEG and EIA/CEG emphatically agree -- is that, once the rules are adopted, TVs with the requisite capability will rapidly become available, with significant additional benefits and minimal increased cost for the consumer.

The only other issue warranting any additional discussion relates to the potential interactions between lines 21 and 22. One party urges the Commission to "determine the extent to which interference to line 22 is probable, and whether it can be avoided."^{12/} The Commission has already solicited comments on this issue,^{13/} and the resulting record contains no evidence of any potential interference from line 21 to line 22, or vice versa. To the contrary, industry experience demonstrates that line 21 and line 22 applications have peacefully coexisted for several years "without a single instance of objectiona[ble] interference."^{14/}

^{12/} Comments of MSTV at 4.

^{13/} See Notice, 8 FCC Rcd. at 91 (¶ 11).

^{14/} Comments of A.C. Nielsen Company at 6; see Comments of WGBH at 2.

On the basis of the foregoing -- and the entire record in this proceeding -- EIA/CEG renews its request that the Commission adopt the rules proposed in the Notice at the earliest practical opportunity.

Respectfully submitted,

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March 16, 1993

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