

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

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

In the Matter of)
)
Digital Data Transmission Within) MM Docket No. 95-42
the Video Portion of Television) RM-7567
Broadcast Station Transmissions)

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**COMMENTS OF THE CONSUMER ELECTRONICS GROUP
OF THE ELECTRONIC INDUSTRIES ASSOCIATION**

The Consumer Electronics Group of the Electronic Industries Association ("EIA/CEG") hereby submits the following comments in response to the Notice of Proposed Rulemaking which the Commission issued in the above-captioned proceeding on May 2, 1995.¹ In these comments, EIA/CEG urges the Commission to allow digital data transmissions within television broadcasts so long as they do not adversely impact the sound or picture quality of television receivers. Technical standards, however, will be necessary to ensure compatibility between transmitting and receiving devices when broadcasters are transmitting digital data to the general public.²

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¹ *Digital Data Transmission Within the Video Portion of Television Broadcast Station Transmissions*, Notice of Proposed Rulemaking, MM Docket No. 95-42, RM-7567, FCC 95-155 (released May 2, 1995) [hereinafter "*Notice*"].

² In addition to these comments, EIA/CEG is also submitting joint comments with the National Association of Broadcasters to report to the Commission on the status of work accomplished by the National Data Broadcasting Committee.

I. INTRODUCTION

EIA/CEG is the principal trade association of the consumer electronics industry. EIA/CEG members design, manufacture, import, distribute, and sell a wide array of consumer electronics equipment, including television receivers and videocassette recorders ("VCRs"). Virtually all Americans who view video programming do so on products produced by EIA/CEG member companies. Thus, EIA/CEG members have a major interest in both how digital data transmissions affect the quality of broadcast television reception and ensuring open and compatible standards for data transmissions to the public.

II. DIGITAL DATA BROADCASTS SHOULD BE PERMITTED, SUBJECT TO NONINTERFERENCE REQUIREMENTS AND THE ADOPTION OF STANDARDS FOR TRANSMISSION TO THE GENERAL PUBLIC.

The Commission seeks comment on whether broadcasters should be permitted to transmit digital data within the video portion of television broadcast station transmissions.³ EIA/CEG agrees with the Commission that such broadcasts "could expand and enhance the use of existing spectrum."⁴ Likewise, the Commission's concern that the quality of television signals and reception not be degraded by ancillary digital data transmissions is well founded. The Commission should approach this issue mindful of the rubric: "above all, do no harm."

The primary purpose of television broadcast signals is to make available video programming, news, information and other important benefits to the public free of charge. The benefits of free television broadcasts have long been noted by the Commission. Any degradation

³ *Notice* ¶ 24.

⁴ *Id.* ¶ 23.

of broadcast signals due to ancillary data transmission would undermine the value of over-the-air broadcasting. Moreover, signal degradation may cause some consumers to believe that their television receivers are not working properly, when the actual cause of reception problems is interference with the broadcast signal. The Commission should therefore ensure that any digital data transmission which it authorizes in this proceeding will not affect signal quality.

The Commission also seeks comment on whether standards should be developed for digital data transmissions intended for the general public, as opposed to transmissions intended for specific subscribers with specialized decoding equipment.⁵ EIA/CEG agrees with the Commission that there may be less need to adopt a standard for transmissions narrowly targeted to specific subscribers, who would likely obtain a decoding device from the service provider. Transmissions directed to the general public, however, are another matter. Just as the NTSC standard (and future ATV standard) aided the development of broadcast television by creating compatible transmission and reception methods, so too will standards create compatible digital data transmissions. If different transmission methods are used, it will be difficult, if not impossible, for television receiver manufacturers to include appropriate decoding circuitry in their products. A standard for digital data transmissions would increase the likelihood that receivers will be equipped with decoders that are capable of receiving all transmissions, permitting maximum use of potential services and efficient use of available spectrum. It is therefore important that the Commission adopt a standard for digital data transmissions to the general public.

⁵ *Id.* ¶ 34.

EIA/CEG will continue to work with NAB through the National Data Broadcasting Committee to develop an open standard for digital data transmission that does not affect the sound or picture quality of television receivers. The Committee will report its progress to the Commission as appropriate. In the meantime, the Commission should adopt policies that encourage open, compatible digital data transmissions while protecting the quality of television broadcasting.

III. CONCLUSION

For all of the reasons set forth above, EIA/CEG urges the Commission to permit digital data transmissions subject to the conditions discussed above. EIA/CEG will continue to work with NAB to develop standards for digital data transmissions to the general public.

Respectfully submitted,

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