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January 23, 2015

Via Electronic Filing

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Room TW-A325
Washington, D.C. 20554

Re: Notice of *Ex Parte* Meeting on Elimination of the Analog Tuner Requirement
MB Docket No. 03-185; GN Docket No. 12-268; ET Docket No. 14-175

Dear Ms. Dortch:

On January 22, 2015, on behalf of Funai Electric Co. LTD. (“Funai”), Aldo G. Cugnini, as consultant to Funai and I, as outside counsel to Funai, met with representatives of the Commission’s Media Bureau (Mary Beth Murphy, Chief of the Policy Division, Steven Broeckaert, Senior Deputy Division Chief, Brendan Murray, and Diana Arrieta) and Office of Engineering and Technology (Mark Settle, Chief of the Policy and Rules Division, Martin Doczkat, Technical Analysis Branch Chief, Hugh Van Tuyl, and Mark Colombo) to discuss the elimination of the analog tuner requirement in Section 15.177(b) of the Commission’s Rules proposed in the above-referenced dockets.

We expressed support for the elimination of the rule and the specific reasons why it should be eliminated – namely, the requirement has largely outlived its purpose because low power TV and TV translators have been moving to digital signals and the remaining stations that have not converted will soon be mandated to broadcast only in digital format. We explained that the requirement hinders innovation and burdens equipment manufacturers by forcing them to design products that contain substantially more complexity than is required, consume more energy, and are heavier/larger than a digital-only product. Consumers are burdened by having to pay the extra cost incurred from complying with this requirement which arises from added hardware, software and various licensing fees. We noted that the Commission is not legally required to retain this requirement. We observed that the Consumer Electronics Association (“CEA”) has

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also voiced support for the elimination of this requirement and the FCC staff has waived it in two prior instances.

In light of the burdens of maintaining this outmoded requirement, we supported Commission action that would eliminate the requirement as soon as possible.

Very truly yours,

/s/

Catherine Wang

cc: Mary Beth Murphy
Steven Broeckaert
Brendan Murray
Diana Arrieta
Mark Settle
Martin Doczkat
Hugh Van Tuyl
Mark Colombo