

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

In the Matter of)
)
Media Bureau Seeks Comment on) MB Docket No. 15-64
DSTAC Report)

COMMENTS OF ADOBE SYSTEMS, INCORPORATED

Adobe Systems Incorporated appreciates the offer to submit comments on the final report from the Downloadable Security Technical Advisory Committee (DSTAC). Adobe is a provider of technologies enabling enhanced experiences for video over IP consumers. Adobe was one of several Digital Rights Management (DRM) providers to present to the DSTAC committee during their fact finding.

Adobe is part of a rich and competitive video ecosystem which utilizes both CAS and DRM technologies provided by many security vendors. Adobe provides a downloadable DRM component which has been extended to almost every video platform, ranging from desktop computers to mobile devices and set top boxes. We provide this as part of a rich app development model which also includes support for analytics and ad-delivery, both critical to the modern video distribution business models.

Adobe has concerns about the "Device Proposal" which relies on DTCP-IP link protection with potential extensions as the single solution for all Multichannel Video Programming Distributors (MVPDs). This proposal does not support the rich policies provided by modern DRM technology and required to support today's video distribution business models. As a single point of attack, this proposal also lacks the flexibility required to respond to the security breaches which will inevitably surface and weaken the overall security. These deficiencies were covered in the DSTAC report, but do not appear to have been addressed by the Device Proposal. We do not believe this proposal in its current form is good for our industry, our customers or consumers in general.

Any security system being considered needs to be as capable as the current modern DRM systems, supporting rich software models encompassing both apps and the open web. Furthermore, it should conform to the HTML5 Proposal and be made available via standardized APIs such as the HTML5 EME.

Respectfully submitted,

/s/ Jeremy Helfand
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