August 30, 2002

Re: Mandatory Digital Rights Management

It seems to me understandable that owners of information want to protect their intellectual property. It also seems to me that the standards process works for the industry.

It is not the place of a federal agency to dictate how a company should design its product. If the digital content providers only produce valued content with the DRM technology, then the replay equipment manufacturers would have a new competitive market for enhanced equipment. Competition would solve the problem. If the DRM producers are unwilling to invest in this technology, then they should not reap any rewards.

In the likely event that the FCC doesn't adhere to the competitive market solution to this problem and requires all manufacturers to install DRM capability then at least it must require technology that is royalty free in all forms.

The FCC should not bless any technology that requires royalties to be paid to any party. The value of IP "contributed" to this effort is recoverd with the resulting reduction in piracy -- the problem this discussion is aimed at solving.

I would look very suspiciously on any act that blessed George Unknown Inventer's patent for enforcing digital rights management. If George or whomever he assigns his patent to, becomes suddenly very wealthy after the DRM equipment is available, I belive the police should be brought on to investigate the decisions.

In the also likely event that the FCC goes down this corrupt-appearing path, the way out is to purchase outright (with FCC money) the required technology and make it public domain. Any other solution will almost certainly provoke accusations and I would support them.

Ed Bradford, Ph.D.
Chapel Hill, N.C. 27514