Philips Electronics

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October 21, 2003

The Honorable Michael K. Powell
Chairman
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: Digital Content Copy Protection (MB Docket No. 02-230)

Dear Mr. Chairman:

Philips submits this response to the Digital Transmission Licensing Administrator's ("5C") October 3, 2003 letter filed in this proceeding.[1]

Although Philips is tempted to provide a point by point rebuttal to each of the erroneous assertions made in that letter, given the accelerated time frame for Commission action in this docket, and the imperative of mitigating some of the most egregious aspects of the regulation proposed by the Motion Picture Association of America ("MPAA") and 5C ("Proposed Regulation"), Philips will confine this reply to two principal points: (1) the Table A structure in the MPAA/5C Proposed Regulation for selecting authorized content protection technologies is bankrupt and should be replaced in its entirety; and (2) Philips has offered two discrete regulatory alternatives in its September 23, 2003 *ex parte* filing,[2] either of which, as more fully discussed in this reply, would extricate the Commission from the most unacceptable dimensions of the MPAA/5C Proposed Regulation.

The MPAA/5C Proposed Regulation and Table A Limit the Selection of Technologies to Encryption-Based Systems, Thereby Impeding Competition and Innovation

Philips believes that the Commission should jettison the Table A structure proposed by MPAA/5C because it represents an unlawful delegation of governmental power to a few companies with a huge financial interest in the outcome of the content protection technology selection process that will inevitably result in the availability of only encryption-based content protection systems and, at least in the near term and perhaps for

[1] *See,* Letter of Michael B. Ayers to Chairman Michael K. Powell of October 3, 2003 in MB Docket No. 02-230 ("5C October 3, 2003 letter").

[2] *See,* Letter of Lawrence R. Sidman to Marlene Dortch of September 23, 2003 in MB Docket No. 02-230 ("Philips September 23, 2003 letter").

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the foreseeable future, only the pre-anointed 5C and 4C technologies. That result is anticompetitive, anti-innovation and anti-consumer and cannot be justified as part of any regulatory action intended to advance the DTV transition.

The 5C's October 3, 2003 letter attempts to defend the Table A structure and the Proposed Regulation to which it is appended by arguing that "the word 'encryption' appears nowhere in the Joint Proposal" and that the Table A approach "keep[s] the field open" to all effective competitive technologies.[3] The 5C arguments, however, are belied by the facts.

The word "encryption" does not have to appear in the text of the Proposed Regulation or Table A for the proposal to, in fact, require the selection of encryption-based content protection technologies. As the Commission is well aware, numerous statutes and regulations achieve a pre-ordained result without naming it, but instead providing a description preclusive of alternatives. Clever drafting does not disguise an obvious result.

In this instance, the following evidences that the MPAA/5C Proposed Regulation contemplates the selection of only encryption-based technologies.

- The proposed compliance and robustness rules in the MPAA/5C Proposed Regulation are encryption-centric. For example, Rules X.6 and X.8 prohibit DTV content from being made available "in unencrypted, compressed form via a User Accessible Bus." (Emphasis added). This is not surprising at all because 5C was originally developed to limit copying of content originating in DVDs or passing through cable systems, where the content is encrypted from the beginning.

- Each of the technologies that MPAA has anointed[4] as satisfying Table A are encryption technologies. In its Comments, MPAA then goes on to state: "We expect that future technologies will also satisfy the criteria in a similar manner."[5]

- In inter-industry discussions, studios have repeatedly taken the position that encryption was an essential element of a content protection system.

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[3] 5C October 3, 2003 letter at 2.

[4] *See,* Comments of the Motion Picture Association of America, et al., in MB Docket 02-230 (Dec. 6, 2002) ("MPAA Comments") at 26.

[5] *Id*.

- The third criterion in Table A, upon which 5C places such great reliance, requires that any technology not selected directly by the studios or the 5C/4C companies be judged by an "independent" party to be "at least as effective" as the approved, i.e., encryption, technologies already on Table A. Thus, encryption technologies are the baseline against which all proposed systems are to be evaluated.

- Finally, in its Comments in this proceeding, 5C describes the state that will apply to broadcast content protection as the "EPN" state, meaning "Encryption Plus Non-Assertion."[6]

Thus, notwithstanding 5C's vigorous denials, the MPAA/5C Proposed Regulation and accompanying selection criteria for Table A do, in fact, enshrine encryption-based content protection technologies. 5C now insists that it does not intend or wish to so limit it. Indeed, 5C states: "The Commission can adopt appropriate functional criteria as an alternative."[7] That is what the Commission should do, in lieu of the MPAA/5C Proposed Regulation. That is what Philips has proposed in this proceeding in two separate regulatory approaches in Philips' September 23, 2003 letter.

Commission Adoption of The MPAA/5C Proposed Selection Criteria For Inclusion on Table A Would Foreclose Development of a Competitive Marketplace, Not Facilitate It

The 5C October 3, 2003 letter tenaciously clings to two notions regarding the MPAA/5C proposed criteria for selection of authorized content protection technologies: (1) they reflect a "marketplace" approach; and (2) criterion 3 would allow for the proliferation of competing technologies because it provides an "independent" means of approval.[8] Both propositions are contradicted by the terms of the criteria and the overwhelming weight of evidence in the record of this proceeding.

The idea that the MPAA/5C Proposed Regulation adopts a marketplace approach is fallacious on several levels. First, a true marketplace approach would not involve government regulation at all, and certainly not the 20-page regulation affecting virtually all digital consumer electronics products proffered by MPAA/5C. Alternatively, a regulatory approach based on competitive marketplace forces might involve government ratification of a true multi-industry consensus as was the case with the FCC's adoption of the DTV standard[9] or Congress' adoption of Macrovision for analog copy protection in the Digital

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[6] Comments of the Digital Transmission Licensing Administration in MB Docket No. 02-230 (Dec. 6, 2003) ("DTLA Comments") at 2.

[7] 5C October 3, 2003 letter at 3.

[8] *See, Id.* at 2-3.

[9] *See, Advanced Television Systems and Their Impact Upon the Existing Television Broadcast Service,* Fourth Report and Order in MB Docket 87-268, 11 FCC Rcd 17771 (1996).

Millennium Copyright Act.[10] Here, the MPAA/5C Proposed Regulation is essentially the same as that considered by the Broadcast Protection Discussion Group, which not only failed to achieve consensus, but sparked bitter division and opposition. Another "marketplace" alternative would be for the Commission to define a functional content protection specification (including necessary enforcement provisions), and allow technologies and technology providers to compete in the market for the business of consumers and device manufacturers to use the technology based on cost and license terms.

The only "marketplace" reflected in the MPAA/5C Proposed Regulation consists of the member companies of MPAA and 5C/4C. Their decision-making controls the outcome under three of the four selection criteria and plays a strong and arguably determinative role under the fourth "independent" criterion. Most notably, consumers are missing entirely from this "marketplace," notwithstanding that the selection of content protection technologies will determine whether they will be able to enjoy the full functionality of digital products they purchase or make obsolete products they already own.[11] Similarly, device manufacturer licensees—the "buyers" in the technology marketplace—have no meaningful voice.

If one is searching for an appropriate economic model for conceptualizing the MPAA/5C Proposed Regulation, it is not a competitive marketplace but rather government-sanctioned delegation of central decision-making to a few private interests. Such a model is completely inconsistent with the FCC's core statutory charter to regulate in the public interest.[12]

The 5C October 3, 2003 letter repeatedly touts criterion 3 as providing a safety valve for "independent" selection of content protection technologies. The 5C concept of "independence" is as curious as its notion of "marketplace." As Philips and other commenters have observed in their Reply Comments, ex parte filings and congressional testimony, this "independent" method for achieving authorization is bounded by the need to conclude that the candidate technology is "at least as effective," taking into consideration both the technology and its associated licensing terms, as any of the previously approved technologies, *i.e.*, 5C or 4C.[13] In other words, 5C and 4C technologies <u>and</u> their licenses are the benchmark for this "independent" determination. Is such a criterion likely to lead to the proliferation of competing content protection technologies? Hardly. That is precisely

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[10] *See*, 17 U.S.C. § 1201(k).

[11] Philips and other commenters in this proceeding already have described in detail the bankruptcy of this approach. *See, e.g.,* Reply Comments of Philips in MB Docket No. 02-230 (Feb. 19, 2003) ("Philips Reply Comments") at 20-23; Reply Comments of Public Knowledge and Consumers Union in MB Docket No. 02-230 (Feb. 19, 2003) ("Consumer Groups' Reply Comments") at 4.

[12] *See, e.g.,* 47 U.S.C. § 310(d).

[13] *See,* Philips Reply Comments at 26; *See also,* Reply Comments of the IT Coalition in MB Docket 02-230 (Feb. 19, 2003) at 10. *See also,* <u>Consumer Privacy and Government Technology Mandates in the Digital Media Marketplace, Before the Senate Committee on Commerce, Science & Transportation</u> (testimony of Chris Murray, Consumers Union) (Sept. 17, 2003), at 4.

why 5C's October 3, 2003 letter urges the Commission "to adopt the four Joint Proposal criteria first."[14] The 5C knows that the technologies initially approved will become the *de jure* and *de facto* standard and will preclude innovative, competitive alternatives.

In its October 3, 2003 letter, 5C in essence concedes that an independent means of selecting authorized content protection technologies is "indispensable."[15] Philips agrees but submits that the selection process should be truly independent, not the bogus independence of criterion 3 in the MPAA/5C Proposed Regulation, and that an independent selection process should be the exclusive means for determining authorized content protection technologies, not an afterthought once the MPAA/5C's self-selected technologies are approved.

5C is absolutely clear in stating: "Commission regulations should keep the field open to all effective redistribution control technologies, so as to promote competition and innovation."[16] Again, Philips agrees wholeheartedly. The problem is that the MPAA/5C Proposed Regulation will have precisely the opposite effect. That is precisely why Philips offered for the Commission's consideration two separate regulatory proposals as Appendices A and B to its September 23, 2003 letter. Either of Philips' proposals will effectuate this common stated objective of Philips and 5C.

<u>The 5C Critique of Philips' Regulatory Alternatives To the MPAA/5C Proposed Regulation Misapprehends and Mischaracterizes Philips' Proposals</u>

The 5C October 3, 2003 letter states: "The Commission can adopt appropriate functional criteria as an alternative."[17] Philips has made just such a proposal in its September 23, 2003 letter. Yet the 5C attacks it as intrusive and overly regulatory. Philips believes that 5C's criticism is grounded in part on a fundamental misunderstanding of Philips' September 23, 2003 letter and in part on a reading of one of the two Philips proposals that distorts the language of the proposal and is clearly contrary to Philips' intent.

The Functional Regulation and Self-Certification Proposal is Independent of Philips' Other Proposal and Offers Common Ground

The 5C October 3, 2003 letter appears to merge Philips' two proposals into one, which it attacks.[18] As is clear from Philips' September 23, 2003 letter, Philips offers two distinct and separate regulatory alternatives.[19] Appendix A to that filing provides for "Functional Regulation and Self-Certification." The 5C October 3, 2003 letter expressly

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[14] 5C October 3, 2003 letter at 4.

[15] *Id.* at 3.

[16] *Id.* at 2.

[17] *Id.* at 3.

[18] *See, Id.* at 4.

[19] *See,* Philips September 23, 2003 letter at 3.

approves of the idea of "functional criteria as an alternative,"[20] taking issue with Philips principally with regard to the role of government in establishing such functional criteria and whether they should augment or supplant the MPAA/5C selection criteria.[21]

Philips is more than willing to participate in a negotiated rulemaking process, for which there is Commission precedent, or a process under Commission auspices/deadline, such as the two-month intensive inter-industry discussions that led to the adoption of the DTV terrestrial broadcast transmission standard, whereby industry would take the lead in proffering consensus functional criteria for the Commission's approval. In this regard, Philips calls the Commission's attention to the statement in the 5C October 3, 2003 letter that "[t]here is no reason for the Commission to rule out any technology that is acceptable to the relevant stakeholders." If 5C intends to include <u>all</u> stakeholders within this construct, including consumers, non-5C and non-4C potential licensors and licensees and the computer industry, Philips agrees. If, however, 5C means that the Commission must bless any technology and associated license terms to which the major studios and the 5C/4C licensors agree, Philips objects vigorously. What about consumers, the functionality of whose equipment purchases is directly affected by these content protection technologies? What about competitors whose product decisions are impacted by these content protection technologies and license terms? It is the exclusion of these concerns from the MPAA/5C proposed selection criteria which renders them unacceptable as part of the regulation and thus requires that they be supplanted.

Yet, Philips' "Functional Regulation and Self-Certification" Proposal is far simpler and does not require further refinement of functional criteria. As set forth in Section Y.4 of this proposed regulation, the digital product in question must be "manufactured so as to prevent the unauthorized redistribution of high definition or other high value digital television content to the public over the Internet." Are 5C or 4C able to self-certify that DTCP or CPRM meets this functional regulation? If so, they should not object. If not, what is impairing their ability to do so?

The 5C Attack on Philips' Second Proposal Is Based on Misunderstandings and Mischaracterizations

Most 5C criticisms of Philips' September 23, 2003 regulatory proposals are directed at Appendix B, "Authorization Process and Licensing Safeguards." Philips rebuts each major criticism here.

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[20] 5C October 3, 2003 letter at 3.

[21] 5C also criticizes the non-discrimination between CE and IT devices proviso; however, that concern is misplaced as described fully in the discussion of Philips' second proposal *supra*.

(a) Philips' Appendix B Proposal Is Not Intended To Exclude Most Available Digital Content Protection Technologies.

5C rests its claim that Philips' Appendix B Proposal would eliminate available digital content protection technologies on three principal grounds: (1) the proposed requirement in Section Z.3(b) that licensing terms not discriminate between consumer electronics and IT devices; (2) the proposed requirement in Section Z.2.b(ii) that the technology not defeat consumers' fair use expectations;[22] and (3) the proposed requirement in Section Z.3(g) to not impose obligations that expand the use of the authorized technology beyond that required in the regulations.[23]

Regarding non-discrimination between CE and IT devices, the intent of Philips' proposal is to prohibit provisions such as those in the 5C and 4C compliance rules that allow certain high quality outputs such as SVGA for computers but not CE devices[24] and the 4C rule mandating a response to CGMS-A in CE devices, but providing IT devices with a free pass to ignore CGMS-A.[25] Such compliance rules make no sense from a content protection standpoint, as they allow the devices most likely to pass content to the Internet—computers—to be subjected to less regulation than CE devices. The 5C recognize this in their Comments, when they argued that "the regulations should adopt nomenclature making clear that the regulations apply evenhandedly to all such devices, regardless of whether they are termed 'consumer electronics' or 'information technology' products."[26]

Further, the non-discrimination provisions proposed by Philips do not support the expansive reading proffered by 5C. For example, the rule in Appendix B (Z.3(b)) would only prohibit license terms, particularly compliance and robustness rules, that discriminate. A technology that is designed for one environment would not have discriminatory compliance rules or license terms. It simply would not be useful in other environments. Similarly, the provision in Appendix A (Y.2) cited by 5C, calls upon the Commission to identify those digital products that must apply self-certified technological protection measures, and calls upon the Commission to ensure that the technological measures do not discriminate. Again, a technology designed for a limited environment would not be discriminatory. However, a general purpose technology such as DTCP and CPRM, intended for both environments, would discriminate if it applied disparate rules in the two environments.

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[22] *See,* 5C October 3, 2003 letter at 4-5.

[23] *See, Id.* at 6.

[24] *See, e.g.*, *Digital Transmission Protection License Agreement*, Exh. B, Part 1, at § 4.3.3, at http://www.dtcp.com/data/DTCP_Adopters_Agreement010730.PDF; **;** *4C CPRM/CPPM License Agreement*, Exh. C-3a, § 4.1.3, at http://www.4centity.com/licensing/adopter.

[25] *See, CPRM/CPPM License Agreement,* Exh. C-3a, § 3.3.

[26] 5C October 3, 2003 letter at 2.

Philips is even more surprised by the 5C objection to the Commission establishing technical standards to prohibit content protection technologies from defeating consumers' fair use expectations. First, such a regulation would not exclude HDCP, as 5C alleges. As all parties to this proceeding know, HDCP is a content protection technology designed exclusively to protect displays and is not applied to interfaces intended for recording. There can be no fair use expectation with regard to interfaces that are essentially unrecordable. Therefore, the purported exclusion of HDCP is a red herring.

More fundamentally, however, 5C's concerns that this aspect of Philips' proposed Appendix B regulation would exclude other technologies, possibly DTCP, runs counter to 5C's and MPAA's assurances, replete in the record of this proceeding, that consumers' fair use expectations will be protected. For example, in its Comments in this proceeding, 5C stated: "redistribution control should affect neither the consumer's right to enjoy broadcast content for private and personal purposes, nor the consumer's reasonable expectations and customary practices with respect to recording broadcast content."[27]

Philips has merely called upon the Commission to assess consumer fair use expectations and to adopt appropriate technological standards to protect those expectations. If 5C's DTCP technology meets those standards, it would not be excluded. If 5C, as it currently exists, fails to meet those standards for use in connection with broadcast content, it could be changed to do so. For example, technologies are being developed that will permit consumers to transmit content to themselves at remote locations. However, to the extent DTCP could not meet such standards respectful of consumer fair use, it must not be allowed to become the baseline against which other technologies are judged for approval, precisely what would occur if the Commission were to adopt the MPAA/5C selection criteria.

The 5C further contends that Philips' proposed Appendix B regulation Z.3.(g) also would result in the exclusion of available content protection technologies.[28] Again, that is incorrect. The Philips proposal embodies a fundamental principle of pooled IP licensing, that a licensor not extend its obligations beyond the scope of the IP being licensed. Contrary to the 5C's interpretation, this condition would not prohibit the 5C from requiring the use of other licensed technologies to protect content over which 5C is properly exercising dominion—that is, content that has been protected using DTCP or CPRM, for which a DTCP or DTCP license is needed to obtain access. Thus, much of 5C's criticism is based on a false premise, and is wrong.

The proposed rule would, however, prohibit extending the 5C rules into functions of a licensed device that are not handling content encrypted by DTCP. It similarly would prohibit 4C from obligating CE devices from examining unencrypted content for a marking technology, and then demanding that CPRM or another 4C-approved technology be used. IP licenses grant the right to use IP. Philips is unaware of any IP license that obligates a

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[27] DTLA Comments at 11.

[28] *See,* 5C October 3, 2003 letter at 6.

licensee to use the licensed technology in circumstances where a non-licensed party would have no such obligation.

(b) Philips' Appendix B Proposal Does Not Mandate Interoperability of All Devices.

The 5C erroneously assert that Section Z.2(b)(v) would potentially require all approved technologies to be interoperable. That is not the case.

Section Z.2.b(v) sets forth the common-sense proposition that if a protection technology is good enough to serve as an output or recordable media technology protection for Covered Products directly under an FCC regulation, it should be good enough for use by downstream devices handling DTV-regulated content. The rule also is necessary to ensure that the proprietors of already approved technologies do not stand as gate-keepers, barring devices that use their content protection technologies from, in turn, using competing technologies.

As the 5C repeatedly has explained, the MPAA/5C model contemplates a set of links (removable-media recordings and interfaces) protected by a menu of approved technologies. A device that receives content over an interface protected by one technology on the menu should be free to send that content over an interface or record that content on a medium protected by any other technology on the menu. Likewise for a device that plays back content from a medium protected by a technology on the menu. The technologies need not "interoperate" or support each other. The device stands as an intermediary, deciding what input, output and media protection technologies it will use, and providing the necessary support.[29] If the FCC does not adopt this rule, new technologies will never be able to compete with existing technologies on anything approaching a level playing field.

(c) The 5C's Objection to Reasonable and Non-Discriminatory Licensing Terms As Opposed to the Non-Assert Provisions of Its License Is Not Sustainable Within the Context of a Government Mandate.

The 5C also takes exception to Section Z.3(a) of Philips' Appendix B Proposal that would prevent a license mandated by government regulation to require a licensee to surrender its own patent claims as a condition of licensing.[30] The 5C defends such "non-assert" provisions as common in content protection technology licenses and seeks to divert

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[29] This is precisely the model Philips adopted when it decided not to support Windows Media format for its audio devices. *See* 5C October 3, 2003 letter at note 6. Philips believes that the choice of a protection technology should be left to the *device* manufacturer; it should not be mandated by an upstream content protection licensor. The correct analogy in the 5C context would be a mandate from Microsoft that Philips devices receiving WMA content continue to use WMA whenever they then output the technology, even if other content protection formats were considered acceptable for the task by the FCC.

[30] 5C October 3, 2003 letter at 7.

the Commission's focus by arguing that the 5C licensors are charging less than commercial royalty rates, only seeking cost recovery.[31]

The 5C defense of non-assert provisions entirely misses the fundamental point of Philips' proposed provision. The context for this license is not the private marketplace but a government regulation that would impact the license terms of selected content protection technologies. What marvelous irony that the proponents of regulation to protect their own intellectual property in video content insist upon requiring all licensees to surrender their intellectual property in patents which may read upon these technologies. As will be discussed in far greater detail in another Philips *ex parte* filing, non-assert provisions akin to those in the 5C and 4C licenses violate the Commission's long-established patent policy and, if required by the Commission, would raise serious questions under the Takings Clause of the Fifth Amendment to the Constitution.

There are only two appropriate models for content protection technology licensing where government regulation requires that companies take a license in order to manufacture compliant equipment under the regulation. First, licensors could simply dedicate the technology to public use, *i.e.*, give it away. Indeed, this was the model adopted by Philips in the case of its SCMS content protection technology under the Audio Home Recording Act.[32] The other is the Reasonable and Non-discriminatory (or "RAND") model proposed in Section Z.3(a). That is the approach reflected in the DFAST license to which the cable and consumer electronics industries recently agreed that was so crucial to the process leading to recentt Commission adoption of digital "plug and play" regulations.[33] It is the approach that should be followed here.

(d) The 5C Did Not Object to Section Z.3(c) of Philips' Appendix B Proposal Dealing with Change Management Procedures.

It is significant that the 5C did not attack Section Z.3(c) of Philips' Appendix B Proposal that would require licensors to give adequate notice of contemplated changes to licensees, provide opportunity for comment and dialogue before implementation, and provide for appeal to the Commission of such changes on specified grounds. Again, this type of change management procedure applicable to the compliance and robustness rules was agreed to by the cable and CE industries in the "Plug and Play" negotiations and is embodied in the DFAST license.[34] Again, it would appear that this provides some common

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[31] *Id.* at 7-8.

[32] *See* Pub. L. No. 102-563, 106 Stat. 4237 (which added Chapter 10 to, entitled "Digital Audio Recording Devices and Media," to Title 17).

[33] *See* DFAST Technology License Agreement for Unidirectional Digital Cable Products ("DFAST License") as attached to Implementation of Section 304 of the Telecommunications Act of 1996: Commercial Availability of Navigation Devices and Compatibility Between Cable Systems and Consumer Electronics Equipment, Further Notice of Proposed Rulemaking,18 FCC Rcd 518, 578 (2003) at ¶ 3.5.

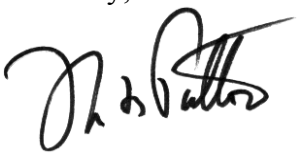
[34] *See* DFAST License, 18 FCC Rcd 518, 580 (2003) at ¶ 6.2.

ground in the licensing area. The Commission should ensure that such a provision be included in any regulations it issues governing licensing terms for authorized technologies.

Philips' Proposals Are Not Overly Regulatory But Rather Essential To Protect Consumers, Competition and Innovation.

The 5C conclude their October 3, 2003 letter by asking the Commission to reject Philips' overly regulatory proposals. Again, what irony! Philips is not the party urging the Commission to adopt a 20-page regulation with countless additional pages to be drafted pertaining to selection criteria. The MPAA and 5C are the proponents of regulation. The overarching question before the Commission, assuming that it decides to regulate it all at this time, is whether it will adopt a regulatory scheme which entrusts protection of consumers and competitors to the nearly unfettered control of a small group of studios and consumer electronics companies with a massive financial interest in exercising that control or whether the Commission will discharge is statutory obligation to protect the public interest by adopting safeguards to prevent abuses. Philips urges the Commission to follow the latter path.

Sincerely,



Thomas B. Patton

cc:

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