

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

In the Matter of)
)
)
Requirements for Digital Television) ET Docket No. 05-24
Receiving Capability)
)

To: The Commission

COMMENTS OF SONY ELECTRONICS INC.

Sony Electronics Inc. (“Sony”) files these Comments in support of the Petition for Rulemaking submitted by the Consumer Electronics Association (“CEA”) and the Consumer Electronics Retailers Coalition (“CERC”), requesting: (1) that the Commission eliminate the requirement that 50 percent of analog-capable television receivers with diagonal screen sizes of between 25 and 35¹ inches inclusive must also include digital tuners beginning July 1, 2005; and (2) that the Commission accelerate to March 1, 2006, the deadline by which all such analog-capable television receivers must incorporate digital tuners (“CEA-CERC Petition”).²

¹ Sony asks the Commission to correct what appears to be a typographical error relating to screen-size measurements in its tuner mandate rules. These rules, as codified at 47 C.F.R § 15.117(i), state that for “[r]eceivers with screen sizes 25” to 36”- 50% of all of a responsible party’s units must include DTV tuners effective July 1, 2005 [and] 100% of such units must include DTV tuners effective July 1, 2006” (emphasis added). Sony believes, and asks the Commission to clarify, that the rule is meant to refer to screen sizes between 25” and 35” inclusive. *See* In the Matter of Digital Television Tuner Requirements, Second Report and Order and Second Memorandum Opinion and Order, MM. Docket No. 00-39, FCC 02-230, at para. 40 (rel. Aug. 9, 2002).

² *See* Petition of Consumer Electronics Association (“CEA”) and the Consumer Electronics Retailers Coalition (“CERC”), ET Docket No. 05-24, filed on November 5, 2004. The Commission issued a Notice of Proposed Rulemaking in this docket on February 14, 2005. *See* In the Matter of Digital Television Tuner Requirements, Notice of Proposed Rulemaking, ET Docket No. 05-24, FCC 05-17 (rel. Feb. 14, 2005).

Sony believes that granting the CEA-CERC Petition will eliminate the unintended consequences of the Commission's 50 percent requirement that became apparent in manufacturing and at retail only recently, but which threaten to impede the roll-out of television receivers equipped with DTV tuners. Granting this petition will also advance the DTV transition by expediting delivery of these popular mid-size television receivers equipped with DTV tuners.

Sony agrees with CEA and CERC that repealing the 50% requirement and accelerating the 100% requirement for 25 to 35 inch receivers to incorporate digital tuners better aligns the Commission's policy with market forces and consumer expectations, as fully discussed in the CEA-CERC Petition. Eliminating the 50 percent benchmark also offers the ancillary benefit of simplifying enforcement of the deadline. In addition, Sony acknowledges and supports the Commission's intention (and the views of CEA and CERC) that there will be no revisions to the July 1, 2007, date by which all broadcast television receivers include DTV reception capability.³

For these reasons and those set forth in the CEA-CERC Petition, Sony respectfully requests that the Commission grant the CEA-CERC Petition.

Respectfully submitted,

³ See NPRM, at 8.

/s/

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