

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

In the Matter of)
)
Annual Assessment of the Status of) MB Docket No. 06-189
Competition in the Market for the)
Delivery of Video Programming)
)

To: The Commission

Reply Comments of the Society of Broadcast Engineers, Inc.

The Society of Broadcast Engineers, Incorporated (SBE), the national association of broadcast engineers and technical communications professionals, with more than 5,000 members world wide, hereby respectfully submits its reply comments in the above-captioned Notice of Inquiry (NOI) relating to video delivery marketplace competition.

I. Long-Haul Truckers and RV Owners are *Not* an Underserved Market

1. In its comments to this proceeding, Clarity Media Systems, LLC ("Clarity") repeats the inaccurate claim made in its applications for fixed Cable Television Relay Service (CARS¹) base stations in the 2,025–2,110 MHz TV Broadcast Auxiliary Service (BAS) band. Specifically, Clarity claims that long-haul truck drivers and the owners of recreational vehicles (RVs) are an "unserved and underserved" market for the delivery of video programming. Just as SBE demonstrated that this claim was inaccurate, in its September 22, 2006, comments opposing the grant of the Clarity CARS applications for "Trucker TV" base stations², SBE now is forced to reiterate this point, rebutting the Clarity comments in response to the NOI.

2. Fundamental to Clarity's request for multiple waivers of the Commission's Part 78 CARS Rules to allow "Trucker TV" base stations is the claim that long-haul truck drivers, and the owners of RVs, cannot obtain multichannel video program distribution (MVPD) when parked at travel plazas, or while on the road, because it is impractical to install a direct broadcast satellite (DBS) receiving

¹ Formerly the Community Antenna Relay Service; the CARS acronym was retained.

² The comments were filed in response to Public Notice DA 06-1664, "Waiver Requests by Clarity Media Systems, LLC to Operate CARS Stations at Flying J Travel Plazas," dated August 23, 2006. Clarity proposed an initial universe of ten Trucker TV base stations at Frazier Park, CA; North Salt Lake City, Utah; Ogden, UT; Rapid City, SD; Blacksburg, SC; Waco, TX; Carmel Church, VA; Fairview, TN; and St. Lucie, FL. However, Clarity also indicated that eventually it would want to deploy such base stations at all of its 165 full-service travel plazas.

SBE Reply Comments: MB Docket 06-189, Video Delivery Marketplace Competition

antenna on a truck or RV. As SBE documented in its Trucker TV opposition filing, and as repeated here in the attached Figure 1 to its reply comments, there is a plethora of low-profile DBS receiving antennas available for installation on trucks and RVs; many with automatic tracking capability.

3. In addition to the availability of DBS service, many truck stops are deploying the Idle Aire system, which brings shore-based heating and cooling to the cabs of trucks parked at a truck stop, eliminating the requirement for trucker's to keep their engines running while parked. As shown in the attached Figure 2, the Idle Air includes both MVPD and broadband Internet access.

II. Clarity's Programming Would Be the Same Nation-Wide

4. Even if Clarity was granted the multiple and significant rule waivers required to allow Trucker TV base stations, the five trucker-oriented "community access" channels proposed by Clarity would not be locally originated at each travel plaza with a Trucker TV base station. Rather their service would be uplinked to a DBS satellite from a distant production point and then re-transmitted by each Trucker TV base station. Therefore this would not result in an area-specific programming service, giving information about local road hazards or state regulatory policies applicable to each travel plaza, but instead would result in a Nation-wide programming service. Such programming would accordingly be potentially available to any truck or RV equipped with a DBS antenna. Moreover, programming would most likely be available as one of the video feeds provided by an Idle Aire MVPD. Thus, by not locally originating programming at each travel plaza, Clarity foregoes any possible public interest and public benefit justifications for a Trucker TV video distribution service in the 2 GHz TV BAS band.

5. However, even should Clarity amend its pending CARS applications to include local programming with significant public interest and benefit, their proposal would still need to be denied based on the many technical deficiencies also pointed out in the September 22 SBE comments to DA 06-1664, and in the follow-up November 20, 2006, SBE *ex parte* comments to that public notice.

III. Summary

6. Clarity's MB Docket 06-189 comments are just as flawed as the claims made in its ten applications for Trucker TV CARS base stations: long-haul truckers and RV owners are neither an unserved or underserved market, but rather have full access to DBS signals. Further, at an ever increasing number of truck plazas this group also has access to MVPD via the Idle Aire system.

List of Figures

7. The following figures have been prepared as a part of these SBE MB Docket 06-189 reply comments:

1. Figure showing the availability of DBS antennas designed for installation on trucks and RVs.
2. Figure showing the Idle Aire system.

Respectfully submitted,

Society of Broadcast Engineers, Inc.

/s/ Chriss Scherer, CPBE, CBNT
SBE President

/s/ Dane E. Ericksen, P.E., CSRTE, 8-VSB, CBNT
Chairman, SBE FCC Liaison Committee

/s/ Christopher D. Imlay, Esq.
General Counsel

December 29, 2006

Booth, Freret, Imlay & Tepper
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Silver Spring, Maryland 20904
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Truck Driver Technology - Satellite TV

Satellite TV Trucking Technology



Sat Com Passport
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The SatCom PASSPort™ Mini Plus is a unique flat-panel satellite antenna system designed for portable DBS-TV broadcast viewing. Compact and lightweight, it is extraordinarily easy to transport and use - absolutely no assembly is required. The system is compatible with all current mini-dish DBS receivers, and the sleek, unobtrusive design blends harmoniously into any environment. The Mini Plus is ideal for people who want to enjoy satellite television anywhere - trucking, camping, boating, or simply relaxing at home. Compatible with all DIRECTV™ and DishNetwork™ receivers

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Examples of Truck-Mountable DBS Antennas



TRACVISION S2

The new, economical satellite TV antenna system for stationary use throughout North America

The affordable and completely self-contained TracVision S2 is the most reliable stationary satellite TV system for people on the go. Using innovative new technology and an easy-to-install design, TracVision S2 is ideal for RVs, fifth wheels, trucks, and motorcoaches. The system automatically acquires DIRECTV®, DISH Network™, and ExpressVu satellite signals with just a flip of a switch. And since all components are housed in the rugged, impact-resistant dome, the TracVision S2 is easy to install and maintain. Wherever you're parked in the continental United States or Canada, TracVision S2 will bring you hundreds of channels of uninterrupted, crystal-clear digital entertainment with CD-quality sound.



TRACVISION L2

The new in-motion satellite TV antenna system for use on North American roads

The completely self-contained TracVision L2 is the most affordable and reliable in-motion satellite TV system for people on the go. Using innovative new technology and an easy-to-install design, TracVision L2 is ideal for RVs, trucks, and motorcoaches. The system automatically acquires and tracks DIRECTV®, DISH Network™, and ExpressVu satellite signals no matter where you are in the continental United States and Canada. And since all components are housed in the rugged, impact-resistant dome, the TracVision L2 is easy to install and maintain. Whether you're parked for the night or cruising down the highway, TracVision L2 will bring you hundreds of channels of uninterrupted, crystal-clear digital entertainment with CD-quality sound. With TracVision L2, getting there is half the fun!



Examples of Truck-Mountable DBS Antennas

On-the-Go

Get the most from your DBS system with our line of versatile dish mounts and on-the-go systems. Don't miss out on your DBS programming while you are in your RV. We make it easy to take your system along with any number of mobile satellite systems and mounts.



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T2 Automotion

Tracks Satellite In Motion



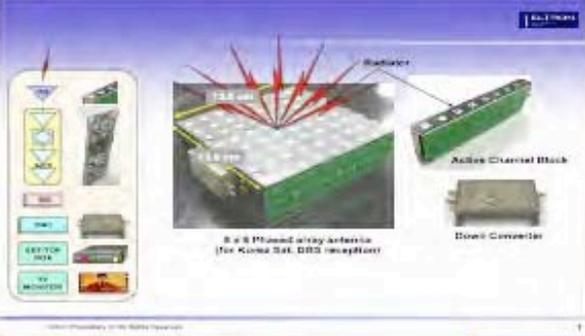
Freedom

DirectTV or Dish Network Satellite TV



Examples of Truck-Mountable DBS Antennas

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2x8 Phased array antenna (for Korea Sat DBS reception)



MB TECH'S ADVANTAGE OVER MARKET

As the size of the technology decreases, so does the already small footprint of the antenna. Thus allowing for more portability, easier use and installation, and the flexibility of mobile use. The fusion of these modules in ever smaller integrated design will enable development of the mobile units.

Ultimately, these innovative products will vastly increase the market size by making product line affordable. "On the go" access to the most popular DBS services around (such DirectTV and DISH) made affordable to all.

The nano-technology also makes the products attractive in a variety of satellite based communications markets. The alliances and partnerships with other nano-technology interests permit MB Tech to integrate quickly and maintain competitive lower costs for production. These are the innovations that will keep their goal of price performance realized even as newer technologies emerge.

Working Model



2x8 Phased array chip is being integrated with 3 LNA + 1 Phase shifter

After integration module will replace to chip

Decreases the antenna height 95%

Module → One chip

Decrease the antenna height from 2 inch to 1 inch

Decrease materials the shell and wire



Sector: Electronics
Outstanding Shares: 62,303,417
Public Float: 24,257,348

THE 2005 MARINE ANTENNA

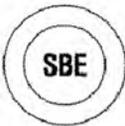
The footprint of this product (left) approximately a 20" diameter dome with 21" height. Immediate markets will be the coastal service businesses of Asia and the yacht market. The design includes the gyro-digital compass system which is a key component in moving vessel satellite tracking. The cost effective implementation of this technology paves the way for implementing mobile tracking of North American satellites, and the nanotechnology development will continue to vary the product line and make the systems more portable and easy to sustain for RVs, SUVs, and other mobile users. *The net result is that MB Tech's line of products can be made more affordable to mainstream consumers.*

STATEMENTS ON RECORD	CONTACT US:
<p>"[MB Tech] plans to be a leader and pioneer in Satellite receiver technologies starting with the multi-horn LNB however, instituted a paradigm shift in its core business from a supplier of electronic components for DBS satellites, to an end-user consumer-driven Company delivering specialized entertainment solutions for the mass market." - November 19, 2004 Quarterly Filing 10QSB</p> <p>"The (marine antenna) price is being targeted well below the industry overall which is in line with the company overall corporate strategy of innovation and price performance." - December 2, 2004 Harwood Bae, CEO MB Tech</p>	<p>Harry Kay, US Director MB Tech (702) 315-0324</p> <p>Mike King, Director Princeton Research (702) 650-3000</p> <p>www.princetonresearch.com</p>

Technology & Innovation Yields Overall Product Line Price Performance

The term "forward-looking statements" is defined in Section 27A of the Securities Act of 1933 as amended (the "Securities Act"), and Section 21E of the Securities Exchange Act of 1934 as amended the "Exchange Act." This article's statements, with the exception of historical fact statements, are reasonable; the company, however, can give no assurance that such expectations will prove different. This article's forward-looking statements are within the meaning of the Private Securities Litigation Reform Act of 1995. While MB Tech, Inc. believes its forecasting and assumptions are reasonable, there are some external factors that are hard to predict and influenced by economic and other conditions that can influence the outcome of performance. Princeton Research, Inc. is on retainer to provide investor relations, research and analysis, and information distribution. Princeton Research received 100,000 restricted shares and \$3100.00 in fees for 2004.

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SATCOM
ELECTRONICS

**SatCom PASSPort™ Mobile DBS
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**Intelligent Automatic Satellite
Search for Power on Play**

The SatCom PASSPort MDBS-AA2000 is a low-profile flat satellite antenna system equipped with a compact multi-axis positioner platform, microprocessor automatic control circuit and intelligent satellite auto acquiring algorithm for mobile satellite TV applications. It is a truly power-on-play satellite flat-antenna system for mobile users traveling in RVs, boats, etc. There is absolutely no setup effort required to be able to enjoy satellite communications anytime, anywhere.

MDBS-AA2000 features

- Compatible with all DIRECTV™ and DishNetwork™ receivers
- Compact and lightweight
- Very low profile in stowed position
- Intelligent Automatic Satellite Search
- One-piece design with integrated Dual Low Noise Block (LNB) output design
- Revolutionary Phased Array technology
- Maintains excellent reception



Examples of Truck-Mountable DBS Antennas



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Idle Aire System

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Step 1: Truck Parked

next slide > next slide >

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Long haul truck drivers idle their trucks to heat or cool their cab during the federally-required 10 hours rest period for every 11 on the road. Idling results in poor rest for the driver, consumes fuel while moving no product, reduces engine life, requires additional engine maintenance, and pollutes the air.

The Solution

IdleAire allows drivers to shut off their engines by providing heating and cooling wherever long-haul trucks idle. The only "retrofit" is a \$10 window adapter for the truck. IdleAire also provides electrical outlets and a variety of communication and entertainment options for the driver.

Who Benefits

Fleets Drivers Lot Owners Communities

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The IdleAire Service Module utilizes an easy to use touch screen to control IdleAire services and to surf the Web. [Click here for more details.](#)

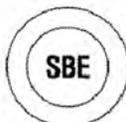
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Wed, 02 Jul 2006 20:00:00 GMT
- » IdleAire Celebrates 7 Million Hours of Service
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Idle Aire System

