Before the
Federal Communications Commission
Washington, D.C. 20554

In the Matter of	)	
	)	
Implementation of Section 304 of the	)	CS Docket No. 97-80
Telecommunications Act of 1996	)	
	)	
Commercial Availability of Navigation Devices	)	
	)	
Compatibility Between Cable Systems and	)	PP Docket No. 00-67
Consumer Electronics Equipment	)	

REPLY COMMENTS OF DIGITAL TRANSMISSION LICENSING ADMINISTRATOR, LLC. ON THIRD FURTHER NOTICE OF PROPOSED RULEMAKING

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REPLY COMMENTS OF DIGITAL TRANSMISSION LICENSING ADMINISTRATOR, LLC. ON THIRD FURTHER NOTICE OF PROPOSED RULEMAKING

Digital Transmission Licensing Administrator, LLC. ("DTLA") submits these Reply Comments to the Third Further Notice of Proposed Rulemaking in the above-captioned proceeding. DTLA licenses the Digital Transmission Content Protection ("DTCP") technology used to protect Controlled Content output over IEEE 1394 and, now, Internet Protocol, from unidirectional and bidirectional digital cable products. Our Reply addresses comments that implicate availability and implementation of DTCP technology and enforcement of DTLA's license rights, including its encoding rules:

- DTCP is a forward-looking technology that accommodates present and future business models for studios and cable services. The recent CableLabs approval (with support of four major motion picture studios) of DTCP-IP implementation in uni-and bidirectional products demonstrates the continuing vitality of both the technology and its encoding rules.

- Content protection technologies can benefit consumers as well as content providers and cable operators, if their powerful tools are tempered by rules that secure the public interest. The Encoding Rules adopted by the Commission in 47 CFR 76.1904, which implement the rules first set by DTLA, should be maintained in any further regulations pursuant to this Third FNPRM.

- Current Commission regulations do not permit use of Selectable Output Control ("SOC"). The comments demonstrate no justification to change this restriction. Notwithstanding, if SOC is ever to be applied, it should only be applied to undefined new business services and not to any content currently delivered to consumers, and never should prevent the flow of content over any protected digital output.

- DTLA could support regulations permitting application of Image Constraint, consistent with the DTLA encoding rules. Those rules, set forth in the DTCP Content Participant Agreement, permit image constraint only for high definition analog output of Controlled Content delivered to the home via conditional access, and required by content owners to be constrained in other similar devices.

- DTLA also could support regulations that permit Redistribution Control (without numerically limiting the making by a consumer of protected copies) for Controlled Content that, under the Commission's Encoding Rules, could be encoded Copy Never or Copy One Generation. Application of Redistribution Control to other content would be equivalent to enabling a private Broadcast Flag. Policy decisions affecting over-the-air terrestrial broadcast content using the public airwaves should be left to Congress and the Commission, not the discretion of content owners and cable services.

- Revocation and renewability affect both consumer rights and competition in the marketplace among device manufacturers. The DTLA agreements provide these tools, but limit their use to conditions and due processes accepted by our Adopters and Content Participants. If the Commission regulates in this area, it should be solely to require a digital cable product to process SRMs and pass them to an output protection technology. At that point, approved output protection technologies would act upon the SRM in accordance with the rules set forth in its license, as would a downstream product pursuant to its license.

- DTLA supports multiple paths to approve digital output protection technologies. Such approval decisions implicate the interests of content owners in robust protection; of cable operators in avoiding harm to the network and theft of service; of the technology proponents in effective competition; and of consumers in ensuring customary and reasonable enjoyment of entertainment content they lawfully acquire. For each path, the Commission should provide a means for aggrieved parties to appeal.

I. BACKGROUND

A. DTLA and the Development of DTCP

In 1998, five companies – Intel Corporation, Hitachi, Ltd., Matsushita Electric Industrial Co., Ltd., Sony Corporation, and Toshiba Corporation – together created DTCP

in response to an open inter-industry technology project. DTCP protects commercially-delivered entertainment content against unauthorized copying, interception, tampering, or retransmission by transmitting it in encrypted form only to devices along the home network that have authenticated compliance with DTCP.

More than 140 companies have licensed DTCP, including manufacturers of television receivers, cable set top boxes, and digital recorders; IT companies; cable system operators; semiconductor manufacturers; and component resellers. Sony Pictures Entertainment, Walt Disney Technology and Licensing Operations, and Warner Bros. have signed agreements as DTCP Content Participants. DTCP is required for plug-and-play digital cable products using IEEE 1394 under the DFAST, PHILA, CHILA and DCAS licenses. On August 23, 2007, pursuant to letters of support from four major motion picture studios that are members of the Motion Picture Association of America ("MPAA"), CableLabs also approved the use of DTCP for Internet Protocol ("DTCP-IP") for products manufactured under those license agreements.

B. DTCP Promotes Interoperability On Home Networks

DTCP protects the transmission link between devices on a home or personal network. As a "link protection method," DTCP facilitates interoperability by securing transmissions of content that may have been stored using different encryption systems, and by enabling content received or delivered by DTCP thereafter to be protected using different transmission protection methods. As an illustration, content from a cable or satellite system protected using conditional access methods can be transmitted securely using DTCP over IEEE-1394 to a DVR. Content recorded on that DVR will be protected using an approved technological copy protection method. That digital recorder then can

output that content securely to a digital television over an HDMI interface protected by HDCP, or using DTCP for 1394 or DTCP-IP. Or, the content can be transmitted along the home network to a personal computer using DTCP, and then can be protected thereafter using HDCP or Windows Media DRM . Encoding rules established by the content owner are respected and implemented correctly at every step downstream.

Currently, DTCP is mapped for use over IEEE 1394, Internet Protocol for wired and wireless transports (including Ethernet and 802.11), MOST and IDB-1394, USB, Bluetooth, and Op-iLink. DTLA approved recording and output protection technologies including D-VHS, CPRM for recordable media, CPS for BD-RE (content protection for Blu-Ray disc recorders), MG-R(SVR) for Memory Stick PRO and Hi-MD, VCPS (for DVD+R/RW recorders), and Windows Media DRM 10 and above.

DTCP has won broad support from major motion picture studios, including as an output protection technology for DVD, AACS-protected high definition optical media, and cable and satellite television in countries around the world. The Commission certified DTCP-1394 and DTCP-IP to protect terrestrial television marked with the "broadcast flag." In 2006, the Digital Living Network Alliance ("DLNA") adopted DTCP-IP as a mandatory content protection technology for home networks compliant with its inter-industry voluntary guidelines. DTCP (including DTCP-IP) is an approved output protection technology for entertainment content received on a wide range of devices, including cell phone-based devices, that use Open Mobile Alliance DRM 2.0.

II. DTLA REPLIES TO SUBMITTED COMMENTS

Protection tools such as DTCP provide important incentives to motion picture studios and video production companies to release content to digital services for home

enjoyment. However, content protection also implicates important public and commercial interests. The public historically has enjoyed reasonable freedom to record broadcast and subscription content for personal use at their convenience. Consumer electronics and information technology companies promote those interests by offering innovative digital networked products and services that give consumers greater flexibility to enjoy that lawfully-acquired content when, where, and how they want. There is no reason to curtail that consumer freedom, particularly when new digital technologies that facilitate networked home and personal uses can prevent unauthorized copying or mass indiscriminate redistribution of protected content.

For that reason, DTLA established from the outset encoding rules that set a ceiling on content protection for certain types of content, and guarantee basic recording and networking privileges for consumers. Those rules were adopted by the Commission in this proceeding and promulgated in 47 CFR § 76.1904. We are aware of virtually no consumer dissatisfaction with the outcomes of the Commission regulations; likewise, the number of DTCP Adopters and Content Participants continues to increase, with no dissent over the DTCP Encoding Rules. Thus, the Commission should reaffirm these encoding rules in any action taken pursuant to the Third FNPRM.

A number of comments suggest the Commission's encoding rules regulations (and, by implication, those of DTLA) somehow fail to keep up with the times. The Commission regulations in fact *anticipated* future innovations in business models, and appropriately accommodated and facilitated them by petition to the Commission. That no petition has yet been filed does not, in our view, indicate a failure of the process. To the contrary, it demonstrates that the balance currently set by the Commission works

well. The absence of consumer complaints attests that the Commission properly denied more powerful controls such as image constraint or selectable output control to be applied to broadcast or subscription content. Through the as-yet untried petition process, studios and cable companies have the means to employ those controls so as to create new business models; and the Commission retains its authority to properly balance the rights of all parties affected by increased content protection. The comments provide no justification to discard the Commission's balanced regulatory construct.

A. The Commission Should Continue to Regulate Selectable Output Control, and Should Not Permit Use of SOC to Turn Off any Protected Digital Output.

The MPAA and the National Cable Television Association comments ask the Commission to lift its regulation of Selectable Output Control. MPAA contends the regulation unnecessarily restricts the marketplace from enabling time-limited cable "rental" services of on-demand content or early release of theatrical motion pictures, and suggests that marketplace negotiations among studios and cable services would somehow be better at protecting consumer interests than the process established by the Commission. *See, e.g.*, MPAA Comments at 4-6. DTLA believes the Commission's current regulations strike the right balance with respect to the application of SOC.

SOC is an extraordinarily powerful tool. If SOC is applied, consumers whose downstream devices lack an input corresponding to the selected digital cable product output will not be able to display that content. Clearly, SOC never should be applied to broadcast or subscription content for which consumers already have paid. Consumers have ordered pay-per-view and on-demand services for a decade or more without any application of SOC, and nothing in either the MPAA or NCTA comments suggests that

content owners or cable services have suffered economic harm from the ability of consumers to receive, display, or pause such content through any available output.

To the extent that MPAA and NCTA comments herald availability of new and compelling television services, DTLA welcomes them – and DTCP accommodates them. DTCP applies "Copy Never" encoding to such high-value content, so that "pay-per-view" and video-on-demand services truly can be view-only. To enable "rental," DTCP currently defines several states by which content can be retained by a consumer device for a specified period of time. DTLA built these capabilities into its Specifications in late 2001, and they have yet to be utilized by content owners. DTCP also was first to incorporate a "move" capability so that a copy lawfully made on a PVR could be "space-shifted" for viewing on another medium or device. Moreover, DTLA recently affirmed its willingness to discuss with CableLabs, service operators and content owners potential extensions of DTCP so as to better accommodate their business concerns.

The potential anti-consumer impact of SOC makes a compelling case for direct Commission supervision over its application. Anyone seeking to deploy SOC should be required to demonstrate why potential benefits for some consumers outweighs disenfranchising hundreds of thousands of other consumers. Nothing in the MPAA or NCTA comments demonstrates why the existing Commission regulation somehow is unfair or detrimental.

The MPAA comments request SOC to prevent the potential release of new, highest-value content over unprotected analog outputs (although they seek the unregulated discretion to apply SOC to any and all content). If lack of protection is the justification for SOC then DTLA believes, if SOC ever is to be permitted, it should be

limited to the output of content over unprotected analog outputs.[1] The Commission should never permit SOC to prevent the flow of content from a protected digital output on a digital cable product. There is no persuasive reason to discriminate among technologies that offer effective content protection, or to favor one among many protected outputs (such as to support a particular business deal). The power to turn off protected outputs would destroy the incentives and certainty that consumers need to invest in digital networked technologies and to accept reasonable levels of content protection. If even protected digital outputs can be shut off freely by service operators by use of SOC, consumers will have no assurance that the products with protected digital outputs they purchase today, in order to receive high-value content, will receive all the content they thought they were bargaining for. Such an outcome would make a shambles of the Commission's efforts to promote consumer confidence in the digital transition.

Thus, if SOC is to be permitted at all, it should be permitted only where approved by the Commission for genuinely new business offerings, and only applied as to unprotected analog outputs.

[1] MPAA and its member companies have accepted this in the past with respect to DTCP. "MPAA and its member companies are not seeking in the 5C license or in the OpenCable PHILA context the ability to turn off the 1394/5C digital interconnect in favor of a DVI/HDCP interconnect through a selectable output control mechanism." *Implementation of Section 304 of the Telecommunications Act of 1996: Commercial Availability of Navigation Devices*, CS Docket No. 97-80, PP Docket No. 00-67, Second Report and Order and Second Further Notice of Proposed Rulemaking (Oct. 9, 2003), n. 152 at 27; citations and emphasis omitted. Although MPAA did not specifically reiterate this commitment in its Comments, we assume that commitment stands and extends to not prejudicing DTCP-1394 and DTCP-IP on unidirectional and bidirectional digital cable products, as well as to not favoring approved digital output protection technologies other than HDCP.

B. Image Constraint Should Not be Generally Applied, and Should Continue to be Subject to Commission Regulation.

MPAA and NCTA comments also request the ability to apply "Image Constraint" to high definition analog output, as an alternative method to SOC. The concept of image constraint originated in discussions between the motion picture industry and DTLA, and first was embodied in DTLA agreements. DTCP provides the possibility to constrain the quality of images delivered over high definition analog outputs, within defined limits. DTLA's definition of constrained image delivers better quality than NTSC or VHS, but inferior to high definition. Encoding rules in the Content Participant Agreement limit the circumstances in which content owners may apply image constraint -- image constraint cannot be applied to content not received via a conditional access technology (such as terrestrial broadcast television), or if the same content is not similarly constrained by content owners when output through other analogous devices. *See* DTLA Content Participant Agreement, http://dtcp.com/data/DTCP_Content_Participant010730.pdf, § 5.1(d) at 24. DTLA would not oppose adoption of regulations permitting application of image constraint with these limitations.

C. Redistribution Control Should Not be Generally Applied, and Absent Broadcast Flag Regulation, Should be Made Available Only for Controlled Content.

The MPAA and NCTA comments additionally support the use of Redistribution Control to prevent consumers from re-distributing content outside the home and personal network. DTCP provides for the possibility of Redistribution Control through a setting known as "EPN" (encryption, plus no assertion of numerical copy controls). Content marked "EPN" will be protected by DTCP against unauthorized retransmission, but can be copied by consumers in protected form without numerical limitation. The DTLA

Content Participant Agreements, in the absence of a government Broadcast Flag regulation, currently allow the use of EPN only to permit greater consumer copying of content that could otherwise have been encoded as Copy Never or Copy One Generation under the DTCP Encoding Rules. EPN currently is *not* permitted to restrict redistribution of content marked Copy Freely under the Encoding Rules.

DTLA has no objection to the application of Redistribution Control under the circumstances currently permitted under the DTLA encoding rules in its Content Participant Agreements. Therefore, DTLA could support the adoption of regulations that permit the application of Redistribution Control (without numerically limiting the making by a consumer of protected copies) of content that under the Encoding Rules could be encoded Copy Never or Copy One Generation.

However, application of Redistribution Control to content other than Controlled Content should not be permitted at this time. Greater redistribution control capability had been contemplated by the Commission in its Broadcast Flag regulations, which DTLA supported. If by legislation or regulation the Broadcast Flag comes into force, DTCP will accommodate redistribution control for such content in both its technical Specifications and its licenses. Absent such regulations, permitting redistribution control of content other than Controlled Content would be equivalent to enabling a private Broadcast Flag. Decisions concerning protection of terrestrial broadcast content implicate broader public interests, and so should be left to Congress and the Commission, not private parties.

D. Commission Regulations to Support SRMs are Unnecessary; License Requirements Can Secure Their Proper Operation.

The MPAA and NCTA comments further support the transmission of system renewability messages, known as "SRMs," from bidirectional cable products. DTCP

provides for such renewability and response to SRMs. A particular device whose certificate appears on the list in the DTCP SRM will be ostracized by compliant devices, and no longer will receive access to DTCP-protected content.

DTLA recognizes the importance of revocation and renewability to content owners. However, revocation and renewability are very powerful tools that affect both consumers' right to use and enjoy equipment and content they lawfully acquire, and competition in the marketplace among device manufacturers. Thus, DTLA agreements provide the possibility of revocation only by individual device certificate (not by product or product model), under strictly limited circumstances where it is clear that particular certificate was stolen, cloned, or otherwise not authorized to be used in that individual device. *See* DTCP Adopter Agreement, http://dtcp.com/data/AA05312005.pdf, § 4.2 at 8. These conditions have been accepted by our content participants and, implicitly, by CableLabs, our Adopters, and others who support the use of DTCP.

DTLA agrees with MPAA that it is unnecessary for the Commission to regulate the delivery of SRMs, but should ensure that no regulations interfere with the use of the ATSC standard A/98 for that purpose. The CableLabs agreements provide that SRMs shall be delivered and passed to the protected digital output of a digital cable product, and the licenses of the authorized digital output protection technologies ensure that the SRMs are properly acted upon in that device and downstream.

If the Commission does determine to regulate in this area, any such regulation should be limited in three respects. First, any such regulation should only require the digital cable product to process SRMs and pass them to the respective output protection technology on the digital cable product. At that point, the approved output protection

technology can receive and act upon the SRM in accordance with the rules set forth in its license, and downstream products that receive SRMs output via the digital cable product can similarly act in accordance with license requirements. As noted above, Commission regulation of such downstream activities is unnecessary (and, we respectfully submit, is likely to be beyond Commission jurisdiction). Avoiding regulation of downstream activities was the approach adopted in the Commission's Broadcast Flag regulation, and we believe it is the right one with respect to SRMs as well. Second, the Commission should not specify circumstances in which revocation is to be required. Those circumstances should be defined in the licenses for the use of the approved digital output protection technologies themselves. Third, revocation should not affect the ability of a device to display and record content that is not Controlled Content. That programming already is available to consumers over the air without content protection, so there is no reason to impose greater restrictions on consumers that migrate to protected technologies.

E. The Commission Should Enable Many Paths to Approval of Content Protection Technologies, But Should Provide Affected Parties a Right of Appeal.

MPAA and CableLabs oppose CEA's proposal that content protection technologies accepted by DLNA also be approved for use with unidirectional and bidirectional digital cable products. As a practical matter, DLNA requires the use of DTCP-IP and optionally Microsoft's Windows Media DRM. Inasmuch as both of those technologies also have been approved by CableLabs perhaps there is no actual point currently in controversy.

DTLA believes decisions as to the approval of digital output protection technologies should not be left solely to the discretion of content owners or cable

services. Program producers and cable services clearly have interests in ensuring protection of content they produce and license at great cost. DTLA appreciates the support of Paramount Pictures, Sony Pictures Entertainment, Walt Disney Company, and Warner Bros. that made possible the approval of DTCP-IP by CableLabs. However, selection of content protection technologies also affects competition, innovation, and interoperability concerns for manufacturers of competitive navigation devices and downstream products. Thus, the Commission should recognize and balance all these interests in regulations governing the approval process.

DTLA believes the Commission should facilitate multiple paths to approval, including approval by CableLabs according to criteria that protect against harm to the physical network and theft of service; approval by four major motion picture studios; and approval by voluntary standards organizations such as DLNA. In each case, however, we also believe it vitally important that the Commission provide for appeal whereby a decision concerning approval can be reviewed by the Commission and overturned. That should equally be true for the developer of a content protection technology that has been denied such approval, or for a group of major program producers concerned with the robustness of a technology approved by DLNA or another voluntary standards body. DTLA invoked such a procedure under the DFAST license with respect to the denial of approval of DTCP-IP, and believes it would be equally beneficial if such a procedure were available for bidirectional digital cable products as well.

One hopes such petitions will never be necessary. Perhaps the approval of DTCP-IP sets a precedent for better cooperation among interested parties. Nevertheless, the

right to petition provides an important safeguard for the rights of content protection developers and the public interest in the availability of competitive technologies.

F. The Commission Should Require Cable-Supplied Digital Cable Products to Include at Least One Networked Digital Output from which Recordings can be Made.

DTCP has been required for 1394 outputs of unidirectional and bidirectional cable devices. CableLabs recently also approved DTCP-IP for unidirectional and bidirectional digital cable products, with the support of four major motion picture studios. These "flavors" of DTCP have been adopted by prominent voluntary home networking standards associations – HANA with respect to DTCP-1394, and DLNA with respect to DTCP-IP. Adoption of these voluntary industry guidelines carries great promise for the development of consumer home audiovisual networks that maximize the value of entertainment throughout the home.

DTLA strongly supports the ability of the manufacturers that support these standards to use DTCP to promote home networking using their preferred protocols. Thus, Commission regulations should not interfere in any way with manufacturers' right to determine which interface protocols best fit with their home networking products, and should permit both manufacturers and consumers to choose the system that works best for their needs. DTLA believes that DTCP is well suited for this task, inasmuch as DTCP can be used with a variety of interface protocols.

What remains essential from DTLA's point of view is that digital cable products offered to the consumer by a cable operator be required to include digital outputs that enable home recording. The impetus for the IEEE 1394 mandate arose from the concern of CE manufacturers that cable services might monopolize the markets for both set-top

boxes *and* downstream products unless navigation devices were required to enable both home networking and home recording using devices that could be purchased competitively at retail. DTLA believes this principle of mandating recordable digital networking interfaces should persist in the Commission's regulations at this time. We are still at the dawn of home networking for audiovisual content. The hoped-for market explosion in networking only can occur through robust competition, and such competition can only be enabled if the cable gateway to the home opens onto the consumer's network – not into a walled garden controlled by cable services. Thus, digital cable products offered to the consumer by a cable system should be required to include at least one digital output that enables interoperability for display and recording by competitive downstream products.

G. The Commission Need Not Promulgate Regulations for Broadcast Monitoring.

While not directly related to the subjects of the Third FNPRM, comments from BMI and ASCAP request a "professional exemption" permitting circumvention of all content protection technologies so as to facilitate their monitoring of music use in broadcasts. DTLA believes there is no need for the Commission to regulate in this area. The BMI-ASCAP comments do not explain any specifics of their monitoring needs or why circumvention is either necessary or more appropriate than licensing. Companies that develop content protection technologies rely on license terms to protect against potential compromise of their efforts by commercial users of their technologies. Rather than regulation, BMI and ASCAP first should explore fully whether it is possible to accommodate their needs through commercial relationships with the developers of content protection technologies.

III. CONCLUSION

DTLA thanks the Commission for initiating this Third FNPRM process. The United States television market is poised to enter into an exciting new phase, not just of digital television but of networked home entertainment products. The prospect of home networking has been DTLA's goal since creating DTCP in 1998, and we hope that, a decade later, DTCP can contribute to making home audiovisual networking a reality.

The marketplace has taken these forward strides because the Commission also has assured protection for all affected parties and the paramount consumer interest. The Commission retains a vital regulatory role to ensure that content protection is not only robust but also appropriate, and that competition flourishes. We respectfully request the Commission to reaffirm its current Encoding Rules, including for selectable output control and image constraint, and to ensure fair and prompt consideration of any new digital output protection technologies.

Respectfully submitted,

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