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

In the Matter of	)	
	)	
DTV Consumer Education Initiative	)	MB Docket No. 07-148
	)	
	)	

To: The Commission

COMMENTS OF DIRECTV, INC.

DIRECTV, Inc. ("DIRECTV") has been a leading provider of digital television services for over a decade and is now at the forefront of providing high definition television ("HDTV") to consumers. DIRECTV subscribers already enjoy access to over 250 channels of 100% digital picture and sound,[1] including local HD broadcast signals in 61 U.S. cities.[2] Moreover, with the investment in and launch of its two new satellites, DIRECTV is currently involved in a nationwide expansion of HD programming that includes plans to retransmit local HD stations in up to 75 markets by year-end, and in 100 markets by the end of 2008.[3] In addition, DIRECTV plans to launch up to 100 national HD channels by year-end.[4] Thus, because DIRECTV is an all digital platform, the DTV transition will be seamless to our over 16 million customers. In short, DIRECTV subscribers do not need any additional or new equipment to continue receiving the crystal clear, all-digital pictures that they receive from DIRECTV today.

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[1] *See DIRECTV, DIRECTV is Home for 2007 MLB Postseason in HD,* press release (Aug. 29, 2007).

[2] *See DIRECTV, DIRECTV Delivers Local HD Programming to Customers in Mankato, Minn.; Local HD Programming from DIRECTV is Now Available in 61 U.S. Cities; DIRECTV Will Offer HD Local Channels in Up to 75 Markets By Year End,* press release (Aug. 29, 2007).

[3] *Id.*

[4] *Id.*

In the above-captioned Notice of Proposed Rulemaking ("NPRM")[5], the Commission seeks comment about how to best inform the American public of the 2009 "digital television transition."[6] As mentioned above, because DIRECTV customers will not be impacted by the digital transition, DIRECTV will embark on a two-pronged educational campaign. First, in order to minimize confusion, DIRECTV will educate its customers that they do not need to do anything to continue to receive their DIRECTV digital television service.[7] Second, in order to assist in making the country's transition to digital broadcasting as seamless as possible, DIRECTV will engage in educational outreach efforts geared towards Americans who will be impacted in some way, including over-the-air viewers who are at risk of losing service in February 2009.

To that end, DIRECTV has joined the Digital Television Transition Coalition ("DTTC"), the members of which are dedicated to making the broadcast transition as smooth as possible for consumers. While the DTTC will involve coordinated efforts to inform viewers of their options in advance of the transition, DIRECTV also is planning its own independent public relations, advertising, and promotional campaigns that will run in 2008. These campaigns will both discuss the benefits of digital DIRECTV services and provide special subscription opportunities for those who currently receive over-the-air broadcast services, particularly those in groups that

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[5] *See In the Matter of DTV Consumer Education Initiative,* Notice of Proposed Rulemaking, FCC No. 07-128, MB Docket No. 07-148 (rel. Jul. 30, 2007).

[6] NPRM ¶ 1.

[7] Because DIRECTV offers up to four standard receivers installed for free in even its most basic service packages, most DIRECTV subscribers have all of the television sets in their homes connected to the DIRECTV service. *See* "Build Your System." DIRECTV.com. https://www.directv.com/DTVAPP/wizard/buildYourSystem1.jsp (Sept. 17, 2007).

may face special challenges in the transition such as senior citizens and/or non-English speaking Americans.

The Commission also has asked whether it should require MVPDs "to insert periodic notices in customer bills that inform consumers about the digital television transition and their customers' future viewing options, with civil penalties for noncompliance."[8] Relatedly, the Commission asks whether it should provide a standard text to be used in such notices.[9] DIRECTV is very supportive of the Commission's efforts to ensure that consumers have all of the information they need regarding the digital transition. DIRECTV has every incentive not only to assuage any anxiety that its current customers may feel when they hear or read about an imminent "digital television transition," but to alert television viewers currently receiving only over-the-air broadcasts that they may weather the 2009 transition without the least interruption in service simply by opting to subscribe to DIRECTV. Indeed, DIRECTV and other digital MVPD services represent not an aspect of the problem, but a solution for those Americans who face potential loss of television service as a result of the digital broadcasting transition.

Because the effect of the transition on television viewers will vary depending on their service, it is critically important that individual companies and trade associations determine how to target their message to ensure that consumers receive accurate information. A one-size-fits-all approach with standardized language will lead to more confusion instead of providing consumers with valuable information needed to assist in the transition. For example, an over-the-air viewer (who will need to actively make changes, whether it be a converter box, subscribing to an MVPD, or purchasing a new television set) will need to hear an entirely different message about

[8] NPRM ¶¶ 3, 9.

[9] NPRM ¶ 10.

the transition than a DIRECTV customer (who will continue to receive crystal clear digital pictures from DIRECTV even after the transition). Thus, allowing MVPDs to tailor the content and delivery of the broadcast digital transition message according to the unique needs, interests, and characteristics of their customers will maximize the value of MVPD participation in consumer education efforts.

DIRECTV is eager to work with the Commission to help educate consumers about the digital transition and the options that are already available to them to receive innovative digital and HDTV services. Indeed, the marketplace has provided every incentive for DIRECTV and other digital MVPDs to ensure that their customers receive accurate information regarding the broadcasters' digital transition, and that those over-the-air viewers understand the options available to them.

Respectfully submitted,

DIRECTV, INC.

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