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Federal Communications Commission
Office of the Secretary

November 14, 2007

HAND DELIVERED

Ms. Marlene Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: Motion for Confidential Treatment of Supplied Technical Information, CS Docket No. 97-80, PP Docket 00-67, Commercial Availability of Navigation Devices

Dear Ms. Dortch:

Please treat this cover letter as a Motion for Confidential Treatment of Supplied Information in CS Docket 97-80 and PP Docket 00-67.

On June 29, 2007 the Commission released the Third Further Notice of Proposed Rulemaking in CS Docket 97-80.[1] On August 24, 2007, Pioneer and several other companies filed joint comments collectively as the Home Networking Proponents.[2]

The Comments describe the need for a robust and viable home network ecosystem for audio-visual content, and make several recommendations as to how the Commission may act to encourage the development of such an ecosystem. In part, the Comments refer to several "Guidelines" published by the Digital Living Network Alliance ("DLNA"). In particular, there are specific references made in Appendix A of the Comments.

Attached are the Network Device Interoperability Guidelines published by DLNA, in several volumes:

- DLNA Networked Device Interoperability Guidelines, expanded October 2006, Volume 1: Architecture and Protocols (October, 2006)
- DLNA Networked Device Interoperability Guidelines, expanded October 2006, Volume 2: Media Format Profiles (October, 2006)
- DLNA Networked Device Interoperability Guidelines, expanded October

[1] *Implementation of Section 304 of the Telecommunications Act of 1996: Commercial Availability of Navigation Devices; Compatibility Between Cable Systems and Consumer Electronics Equipment,* Third Further Notice of Proposed Rulemaking (rel. June 29, 2007) ("FNPRM").
[2] *Joint Comments of the Home Networking Proponents on Third Further Notice of Proposed Rulemaking,* CS Docket No. 97-80, PP Docket No. 00-67 (August 24, 2007) ("Comments").

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2006, Volume 1: Architecture and Protocols (October, 2006)

- DLNA Networked Device Interoperability Guidelines, expanded October 2006, Volume 3: Link Protection
- DLNA Home Networked Device Interoperability Guidelines, Version 1.5, Errata – Edition 2 (September 26, 2005)
- DLNA Home Networked Device Expanded Interoperability Guidelines, Version 1.5, Addendum to Volume 2: Media Format Profiles (October 26, 2006)

These publications, while generally available to members of DLNA, are published works which are sold to the general public for a fee. We recognize, however, that the Commission should like to refer to these documents during its deliberation on this matter and are therefore supplying copies of these documents to the Commission without charge.

However, we do hereby request that these publications be treated as 'confidential', in the meaning of Section 0.459 of the Commission's rules. These publications are sold to the public, and routine publishing of these documents via ECFS would significantly affect their market value and cause harm to DLNA – but availability for public inspection via viewing in person need not be limited (and, as noted above, these documents are available to the general public for a reasonable fee).

If this motion is denied, please return the attached materials to me at the above address. In any case, please feel free to contact me if I may be of further assistance.

Regards,

Adam Goldberg
Vice President
Government and Industry Affairs
Pioneer North America, Inc.
(703) 846-3650

Enclosures (3)

cc: Alison Greenwald Neplokh

DLNA Networked Device Interoperability Guidelines

expanded: October 2006

Volume 1: Architectures and Protocols

An Industry Guide for Building Interoperable Platforms, Devices, and Applications

Fulfilling the promise of the digital home requires a cross-industry effort to develop and promote a common industry framework for interoperability. This industry framework is expressed through the DLNA Networked Device Interoperability Guidelines document that has been developed to provide Consumer Electronic, Mobile Device and PC companies with the information needed to build interoperable platforms, devices, and applications for the digital home.

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DLNA Networked Device Interoperability Guidelines

expanded: October 2006

Volume 2: Media Format Profiles

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DLNA Networked Device Interoperability Guidelines

expanded: October 2006

Volume 3: Link Protection

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Digital Living Network Alliance Home Networked Device Interoperability Guidelines Version: 1.5

Errata – Edition 2

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Digital Living Network Alliance Home Networked Device Expanded Interoperability Guidelines Version: 1.5

Addendum to Volume 2: Media Format Profiles

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