

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

In the Matter of:)	
)	
Carriage of Digital Television Broadcast)	CS Docket No. 98-120
Signals: Amendment to Part 76 of the)	
Commission's Rules)	

COMMENTS OF THE CONSUMER ELECTRONICS ASSOCIATION

The Consumer Electronics Association (“CEA”) is pleased to submit these comments in response to the Commission’s Third Further Notice of Proposed Rulemaking in the above-captioned proceeding.¹ CEA is the principal U.S. trade association of the consumer electronics and information technologies industries. CEA’s more than 2,200 member companies include the world’s leading manufacturers. CEA’s members design, manufacture, distribute and sell a wide range of consumer products including television receivers and monitors, computers, computer television tuner cards, digital video recorders, game devices, navigation devices, music players, telephones, radios, and products that combine a variety of these features and pair them with services – all as chosen by consumers in an open marketplace.

¹ *In the Matter of Carriage of Digital Television Broadcast Signals: Amendment to Part 76 of the Commission’s Rules*, CS Docket No. 98-120, Third Further Notice of Proposed Rulemaking (rel. Nov. 30, 2007) (“Third FNPRM”).

In the Third FNPRM, the Commission seeks comment on how downconverted digital signals should be adjusted on consumers' screens (e.g., letterboxing, centering, etc.), and if the Commission does not adopt a rule, who should make that decision?²

CEA supports the position set forth by the National Association of Broadcasters (NAB) and the Association for Maximum Service Television (MSTV) that for signals converted at the headend, broadcasters make the determination, and for signals converted at a converter box, the boxes be required to allow the consumer to determine the format.³ CEA believes that broadcasters are in the best position to determine the format for downconverting broadcast programming and subsequent distribution to cable subscribers. The broadcasters' preferences, therefore, should be maintained throughout the cable conversion process.

On the consumer side of the viewing equation, the Active Format Description system (AFD) is a standard (with supporting recommended practices) that allows broadcast receiving equipment to display images in the best way possible. As CEA advocated in the Commission's Third Period Review regarding our nation's transition to digital television, use of AFD and bar data throughout the creation, transmission, and display chain would greatly enhance the viewing experience by allowing receivers to automatically optimize the image for every program and channel.⁴ Based on past history, broadcasters are motivated to provide the best possible viewing experience and will transmit AFD and bar data accordingly.⁵ CEA, therefore, asserts that AFD and bar data in digital television transmissions should be voluntary.

² *Id.* at para. 77.

³ See Comments of NAB and MSTV, *In the Matter of Carriage of Digital Television Broadcast Signals: Amendment to Part 76 of the Commission's Rules*, CS Docket No. 97-120, Second Further Notice of Proposed Rulemaking, at p. 24 (filed July 16, 2007).

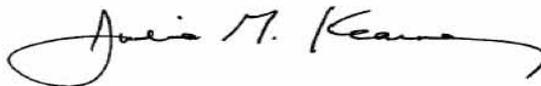
⁴ See Comments of the Consumer Electronics Association, *In the Matter of Third Periodic Review of the Commission's Rules Affecting the Conversion to Digital Television*, MB Docket 07-91 (filed Aug. 15, 2007).

⁵ Indeed, the Society of Motion Picture and Television Engineers (SMPTE) has an ongoing effort underway to standardize and further automate carriage of AFD data throughout the content production, editing, and broadcast distribution chain.

As CEA maintained in its comments in the Third Period Review, while we do not recommend that the Commission require broadcasters to transmit AFD and bar data; however, when AFD and bar data are transmitted, that signaling should be in accordance with ATSC A/53 Part 4:2007 and with a sufficient phase-in period to allow cooperative testing and integration into production facilities.⁶ Broadcasters also should be cognizant of the guidance by which manufacturers are likely to design DTVs, as contained in CEA-CEB-16. This CEA bulletin, *Active Format Description (AFD) & Bar Data Recommended Practice*, was developed through CEA's ANSI accredited standards process in anticipation of the benefits of using AFD to improve the consumer viewing experience in a world of downconverting and mixed video formats.

In conclusion, CEA recommends that for signals converted at the headend, broadcasters make the determination, and for signals converted at a converter box, the boxes be required to allow the consumer to determine the format.

Respectfully submitted,



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⁶ *A/53 Part 4:2007, ATSC Digital Television Standard Part 4 – MPEG-2 Video System Characteristics*, Advanced Television Systems Committee, January 3, 2007.