



Sony Electronics Inc.

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March 10, 2008

EX PARTE, VIA ECFS

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

Re: DTV Consumer Education Initiative
MB Docket No. 07-148

Dear Ms. Dortch:

On March 7, 2008, Jim Morgan, Director and Counsel of Sony Electronics Inc. ("Sony") spoke by telephone with Rudy Brioché, Legal Advisor to Commissioner Adelstein, regarding the Report and Order in the proceeding specified above. During this call, Sony requested the following, consistent with the ex parte submission by the Consumer Electronics Association, dated March 6, 2008:

- 1) that the Commission extend the deadline by which consumer electronics manufacturers must begin including information explaining to consumers what effect, if any, the digital television transition will have on the product's use. (See Report and Order, para. 46); and
- 2) that the Commission whether that it in fact intended for manufacturers to include the required consumer notice with products like DVD players and game systems that are "designed to be connected to, and are dependent on, television receivers." (Report and Order, para 47).

Regarding the first request, Sony asked that the Commission set the deadline for including this information to 30 days from the date on which the Report and Order is published in the Federal Register, rather than on the date of Federal Register publication as specified in paragraph 72 of the Report and Order. If granted, such an extension would allow Sony and other manufacturers sufficient lead time to ensure compliance with this obligation, and is consistent with the deadline set by the Commission for multichannel video programming distributors to provide similar information to consumers. (See Report and Order, para. 38).

Regarding the second request, Sony noted that the Commission has not traditionally regulated devices, like DVD players and video game consoles, that are not designed to receive over-the-air television signals, other than for their electromagnetic emissions characteristics

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pursuant to Part 15, subpart B of the Commission's rules. Regulating such devices now would represent a significant departure from past practice, and would likely result in unnecessary consumer confusion. Sony suggests that the limiting this obligation to the non-receiver devices covered by the Commission's digital tuner mandate (47 C.F.R. § 15.117(i)(iv)) would achieve the same goal of informing consumers about the digital transition while avoiding such confusion.

This letter is provided pursuant to Section 1.1206 of the Commission's rules. A copy of this letter has been delivered by e-mail to Mr. Brioché.

Please direct any questions regarding this notice to the undersigned.

Respectfully submitted,

/s/ Jim Morgan

Jim Morgan
Director and Counsel
Government and Industry Affairs
Sony Electronics Inc.

cc: (via electronic mail)
Rudy Brioché