

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of :)
)
Implementation of the Child Safe Viewing Act:) MB Docket No. 09-26
Examination of Parental Control Technologies)
For Video or Audio Programming)

To: The Commission

Comments of DTV Innovations

DTV Innovations provides products and solutions to assist television broadcasters with their conversion to digital as defined by the Advanced Television Systems Committee (ATSC) standards. We are fully dedicated to the development of new advancements in digital broadcasting including end-to-end solutions.

The Commission's thoughtful Notice of Inquiry entitled the Implementation of the Child Safe Viewing Act: Examination of Parental Control Technologies for Video or Audio programming prompted a review of one of our company's products, PSIP Pro electronic program guide generator, as it relates to the important feature of parental control known as V-chip.

A reexamination of the Commission's regulations as they pertain to broadcasters led our company to the conclusion that, despite the fact only TV Guidelines and MPAA rating tables have been authorized for use in the United States, broadcasters need to have the capability, as do digital television receivers, to deal with revised or entirely new ratings.

To the best of our knowledge the capability to transmit that new rating information has not been included in any DTV Broadcast Station installations in the United States to date. While DTV Innovations does not believe this will cause any immediate difficulties it could provide an additional level of complexity to any new rating system that might be developed in the future. DTV Innovations believes the ability to transmit new or additional ratings information to be a common sense tool broadcasters should have in place as part of the digital transition.

DTV Innovations has developed a no charge software patch that will bring the more than 300 television stations it serves that capability. If and when improvements are made to the parental control system having both the transmission capability and receiver capability in place and tested can be only beneficial. DTV Innovations software is now available for testing purposes and we suggest several test markets be identified to allow both broadcasters and receiver manufacturers to ensure real world capability is in place and functioning properly.

Another question raised in the Commission's Notice of Inquiry relating to commercials being rated with V-chip information or other technology to filter out commercials with inappropriate content. It is possible to rate commercials in the same way programs are rated today but, a problem is created on consumer receivers when the electronic program guide is displayed. Due to a limited amount of space to display an event title, the introduction of commercials would segment the existing guide into multiple segments rendering it unreadable to the consumer. It is our opinion the Advanced Television System Committee (ATSC) A/65 specification would require modification to achieve and furthermore, legacy receivers are another concern.

The ATSC A/65 specification already allows multiple ratings per event so; inclusion of future ratings would further extend this functionality. One issue arises when two networks send different ratings for the same program. If a consumer viewing this program changes channels from the one network to

second network, the program from the first network may be blocked and not blocked on the second so, a method to manage this will also have to be investigated.

DTV Innovations fully supports any measure that will benefit children. If an improvement or new rating system can assist parents to provide benefit to one child those in our industry must do all in our power to make certain the technical process is in place to get the job done efficiently and seamlessly.