Before the
Federal Communications Commission
Washington, DC 20554

In the Matters of	)	
	)	
International Comparison and Consumer Survey Requirements in the Broadband Data Improvement Act	)	GN Docket No. 09-47
	)	
A National Broadband Plan for Our Future	)	GN Docket No. 09-51, NBP PN #27
	)	
Inquiry Concerning the Deployment of Advanced Telecommunications Capability to All Americans in a Reasonable and Timely Fashion, and Possible Steps to Accelerate Such Deployment Pursuant to Section 706 of the Telecommunications Act of 1996, as Amended by the Broadband Data Improvement Act	)	GN Docket No. 09-137
	)	
Implementation of Section 304 of the Telecommunications Act of 1996; Commercial Availability of Navigation Devices	)	CS Docket No. 97-80

Comments of RVU Alliance

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EXECUTIVE SUMMARY

RVU™ technology allows the television viewer to experience a consistent user interface while watching live or recorded programming on various manufacturer-branded TVs and clients. RVU (pronounced "R-View") uses DLNA as a foundation. RVU-compliant TVs and clients are networked in the home with an RVU server, and once connected, the TV viewer can watch content from any room. RVU technology offers a novel remote user interface that allows user interactions such as guide, trick play and interactive applications—all via a thin client.

Created with the input of a mix of service providers, consumer electronics manufacturers and technology companies, the RVU technology is well suited for “gateway” devices that would allow video networks to connect and interact with compatible home video network devices.

The RVU Alliance (www.rvualliance.org) was founded in the summer of 2009 by Broadcom, Cisco, DIRECTV, Samsung and Verizon. The RVU technology will be demonstrated at the Consumer Electronics Show in January 2010, and the first consumer products integrating RVU technology will appear later in 2010. As the RVU technology uses DLNA technology as a foundation and features a lightweight client footprint, it may be compatible with many currently available connected consumer products that already feature DLNA.

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Comments of RVU Alliance

The RVU Alliance (www.rvualliance.org) submits these comments in the above referenced proceeding, responding to those questions asked by the FCC that are relevant to the RVU Alliance's goals of encouraging the rapid, broad, and open industry adoption of Remote User Interface (RUI) technology for whole-home television entertainment.

FCC Questions that the RVU Alliance is qualified to comment on:

C. Can the home broadband service model be adapted to allow video networks to connect and interact with home video network devices such as televisions, DVRs, and Home Theater PCs via a multimedia home networking standard?

RVU Alliance Response:

The RVU™ technology is a multimedia home networking standard that would allow video networks to connect and interact with home video network devices such as televisions, DVRs, and Home Theater PCs.

Home broadband service separates the elements specific to the platform by using a gateway device, such as a cable modem, DSL modem, or optical network terminal to convert the signals to Ethernet, the de facto home-networking standard. The Digital Living Network Alliance ("DLNA") and the High Definition Audio/Video Networking Alliance ("HANA") each assert that their home networking standards would be well suited to connect interface devices to a consumer's home network, as an analogue to Ethernet in the data networking world. We seek comment on how these standards would be implemented.

1. Are DLNA and HANA the only home networking standards that the Commission should consider in reviewing this model? If not, which other standards should the Commission consider?

RVU Alliance Response:

Announced in the summer of 2009, the RVU Alliance is an Oregon-based non-profit mutual benefit corporation formed to develop a specification for the new RVU™ technology including a full-featured “pixel accurate” Remote User Interface (RUI).

In just a few months, the Founding Promoter members (Broadcom, Cisco, DIRECTV, Samsung and Verizon) have been joined to date by ten more Promoter members (Active Video Networks, AT&T Labs, Entropic Communications Inc., Humax, JetHead Development Inc., Motorola Inc., NXP Semiconductors, Pace plc, Solekai and Thomson) and four Contributor members (Airgain, Cortina Systems, SONY Inc and Zoran Corporation).

The RVU technology will be demonstrated by a number of members at the CES2010 Consumer Electronics Show in January 2010, shown operating with a live signal from DIRECTV and integrated on a variety of hardware platforms. The first consumer products integrating RVU technology will appear later in 2010.

2. What are the strengths and weaknesses of each home networking standard?

RVU Alliance Response:

RVU™ technology allows the television viewer to experience a consistent user interface while watching live or recorded programming on various manufacturer-branded TVs and clients. RVU (pronounced "R-View") uses DLNA as a foundation. RVU-compliant TVs and clients are networked in the home with an RVU server, and once connected, the TV viewer can watch

content from any room. RVU technology offers a novel remote user interface that allows user interactions such as guide, trick play and interactive applications—all via a thin client.

The RVU technology is expected to accelerate the availability of service provider content throughout the connected home. Its pixel accurate RUI technology will provide an identical user experience on all RVU-based thin client CE devices throughout the connected home. Also, a server-controlled, common user experience helps enable the rapid introduction of new features and applications that typically accompany commercial content. Furthermore, refinements to the user experience can be deployed in the home with a single update in the RVU-based media server appearing on all subscribing thin client CE devices.

Created with the input of a mix of service providers, consumer electronics manufacturers and technology companies, the RVU technology is well suited for "gateway" devices that would allow video networks to connect and interact with compatible home video network devices.

3. Would any of these standards allow consumers to use existing technology? For example, many devices already in consumers' homes can accept firmware upgrades and are already DLNA or HANA certified. Could the Commission adopt a network interface standard that allows those devices to connect to an MVPD network?

RVU Alliance Response:

The RVU technology is available to consumer electronics (CE) manufacturers via the publicly available RVU Protocol Specification, which can be ordered directly from the RVU Alliance.

As the RVU technology uses DLNA technology as a foundation and features a lightweight client footprint, it may be compatible with many currently available connected consumer products that already feature DLNA. In particular, a software program compliant with the RVU client protocol could be implemented that would be compatible with many personal computers already in consumers' homes.

Respectfully submitted,

RVU ALLIANCE

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