

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

In the Matter of	)	
Request for Limited Waiver of Section	)	
15.117 Of the Commission’s Rules to	)	MB Docket No. 10-111
Permit the Marketing of Digital-Only	)	
Television Receivers Designed to Provide	)	
Mobile Television Reception	)	
	)	

To: The Commission

**Comments of Roundbox Inc.**

Roundbox Inc. (“Roundbox”) respectfully submits the following comments in response to the Federal Communications Commission’s (“Commission”) Public Notice<sup>1</sup> seeking comment on the Petition for Waiver of Hauppauge Computer Works<sup>2</sup> (“Hauppauge”) and the Joint Petition for Waiver of Dell and LG Electronics<sup>3</sup> (“Dell/LG”). In summary, both Petitions request that the Commission grant limited waiver of Section 15.117 of the Commission’s rules<sup>4</sup> in order to permit the marketing, manufacturing, importation, and distribution of mobile television receivers designed for nomadic use (such as cell phones, smart phones, personal digital assistants,

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<sup>1</sup> See Media Bureau Action Expedited Comment Dates Established For Requests for Waiver of Certain TV Tuner Requirements In Order To Import and Distribute Mobile DTV Receivers Without Analog Tuners. *Public Notice*, MB Docket Nos. 10-111 (rel. May 20, 2010) (“Waiver Public Notice”).

<sup>2</sup> Hauppauge Computerworks, Inc., Request for Waiver of Section 15.117 of the Commission’s rules to Permit the Manufacture, Importation, Marketing, Distribution and Sale of Digital Only Television Receivers for Mobile Devices, *Petition for Waiver*, MB Docket No. 10-111 (filed May 19, 2010).

<sup>3</sup> Dell Inc. and LG Electronics USA, Inc., Request for Waiver of Section 15.117 of the Commission’s Rules, *Petition for Waiver*, MB Docket No. 10-111 (filed May 12, 2010) (“Dell/LG Petition for Waiver”).

<sup>4</sup> 47 C.F.R. § 15.117 (2009)

netbooks, and laptop computers) without analog tuners, but with the capability to receive mobile digital television (“Mobile DTV”) transmissions made using the A/153 ATSC Mobile DTV Standard (“A/153 MDTV Standard”) and, optionally, the A/53 Advanced Television Systems Committee (“ATSC”) DTV Standard (“A/53 DTV Standard”). Roundbox supports the Petitioner’s request and believes that limited waiver of Section 15.117 of the Commission’s rules is necessary to facilitate the rollout of Mobile DTV services and devices. Roundbox does not believe that granting limited waiver to Mobile DTV device manufacturers would cause any undue harm on the broader broadcast marketplace—including the various classes of low power television (“LPTV”) stations.

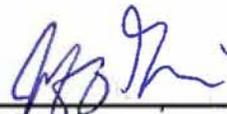
Roundbox respectfully requests that the Commission grant the Petitions for Waiver of Dell/LG and Hauppauge. Granting the limited relief requested will help jumpstart Mobile DTV as a new and innovative information and entertainment medium. Roundbox is encouraged by the expedited timeline for comment set forth by the Commission’s Public Notice and hopes that the Commission will quickly evaluate comments and grant the requested relief in order to allow manufacturers to rollout products in time for the 2010 holiday season.

Respectfully submitted,

**ROUNDBOX INC.**  
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Paul Mercer  
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