

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

In the Matter of)

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MB Docket No. 10-111

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Petitions for Waiver of Section 15.117)
Of the Commission's Rules to Permit the)
Marketing of Digital-Only Television Receivers)
Designed to Provide Mobile Television Reception)

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**COMMENTS OF THE
ADVANCED TELEVISION SYSTEMS COMMITTEE, INC.**

1. Introduction and Summary

The Advanced Television Systems Committee, Inc. (“ATSC”)¹ submits these comments to the Federal Communications Commission (“FCC” or “Commission”) for consideration in connection with the above-referenced docket.² The ATSC is an interested party as a result of its involvement in the development of the ATSC DTV Standard (A/53) adopted by the Commission as the standard for digital television broadcast and the ATSC Mobile DTV Standard (A/153). The ATSC supports the Petition of Dell & LG Electronics requesting a waiver of the requirement to include analog tuners in devices which are capable of receiving ATSC Mobile DTV transmissions.

2. ATSC Mobile DTV Standard (A/153)

The ATSC membership approved the ATSC Mobile DTV Standard (A/153) on October 15th, 2009. A/153 defines the technical specifications necessary for broadcasters to provide new services to mobile and handheld devices using their digital television (DTV) transmissions. The new services for mobile and handheld devices are carried along with current DTV services without any adverse impact on legacy receiving equipment. ATSC Mobile DTV was developed to support a variety of services including free (advertiser-supported) television and interactive services delivered in real-time, subscription-based TV, and file-based content download for playback at a later time. The standard can also be used for transmission of new data broadcasting services.

¹ **The Advanced Television Systems Committee** is an international, non-profit organization developing voluntary standards for digital television. ATSC member organizations represent the broadcast, broadcast equipment, motion picture, consumer electronics, computer, cable, satellite, and semiconductor industries. The ATSC creates and fosters implementation of voluntary Standards, Recommended Practices and Technology Group Reports to advance terrestrial digital television broadcasting, and to facilitate interoperability with other media. The ATSC developed the ATSC Digital Television Standard, most of which the Commission adopted as its DTV broadcast standard in 1996.

² See FCC Public Notice, Media Bureau Action, Petition for waiver MB Docket No. 10-111

The ATSC Mobile DTV Standard will enable broadcasters to provide new compelling services to consumers utilizing a wide array of wireless receiving devices including mobile phones, small handheld DTVs, laptop computers and in-vehicle entertainment systems. A/153 is built around a highly robust transmission system based modulation, with enhanced error correction and other techniques to improve robustness and reduce power consumption in portable receivers, coupled with a flexible and extensible Internet Protocol (IP) based transport system, efficient MPEG AVC (ISO/IEC 14496-10 or ITU H.264) video, and HE AAC v2 audio (ISO/IEC 14496-3) coding. ATSC Mobile DTV services are carried in existing digital broadcast channels along with current DTV services without any adverse impact on legacy receiving equipment.

3. Support for Waiver Requests

The ATSC respectfully suggests that the Commission grant a limited waiver of Section 15.117 of its rules³ in order to permit the manufacturing and sale of television receivers which are designed for receiving ATSC Mobile DTV (A/153) signals, may or may not have A/53 receiving capability but do not have analog reception capability. We believe the commission should consider the following points:

- 1) Design and manufacturing of handheld and mobile receivers is challenging. Designers must make trade-offs in terms of features and functionality and issues such as power consumption, heat dissipation, weight and space requirements. Manufacturers are in a better position to make these ongoing judgments regarding their products and they should not be required to incorporate functions that are not likely to be used in the market place.
- 2) Incorporation of an analog tuner in mobile DTV receivers is not likely to provide consumers with any significant benefits. The ATSC developed the Mobile DTV Standard to enable reception on mobile and handheld devices that will be used in difficult in-motion reception environments where reception of analog or A/53 based DTV will not be achievable. Manufacturers of Mobile DTV receivers are in the best position to determine the

³ 47 C.F.R. § 15.117 (2009)

requirements of their products. With a wide array of products coming to the market, the decision to include analog or A/53 receiving capability in Mobile DTV receivers should be made by the manufacturer. The type of product may be a factor in this determination. For example, a manufacturer might decide that a mobile phone with A/153 reception capability does not need analog or A/53 reception capability, but may believe that it would be beneficial to incorporate that capability in a nine inch personal TV receiver.

4. Conclusion

One of the many benefits of digital television is the ability to enhance and expand the functionality of the technology. Implementation of ATSC Mobile DTV will bring a wide array of innovative products to the marketplace. These products should not be burdened with unnecessary requirements. The ATSC suggests that the commission grant a limited waiver of Section 15.117 of its rules as requested by Dell/LG.

Respectfully submitted,



Mark S. Richer
President

Advanced Television Systems Committee, Inc.
1776 K Street, NW
Suite 200
Washington, DC 20006