

**Before the
Federal Communications Commission
Washington, DC 20554**

_____)	
In the Matter of)	
)	
Dell Inc.)	
LG Electronics USA, Inc.)	
Hauppauge Computer Works, Inc.)	MB Docket No. 10-111
)	
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)	
_____)	

**REPLY COMMENTS OF THE CONSUMER ELECTRONICS ASSOCIATION
IN SUPPORT OF PETITIONS FOR WAIVER**

The Consumer Electronics Association (“CEA”) respectfully submits these reply comments in the captioned proceeding relating to the two petitions for waiver of 47 C.F.R. § 15.117 (the “Petitions”) submitted by (1) Dell Inc. and LG Electronics USA, Inc. and (2) Hauppauge Computer Works, Inc. (collectively, the “CE Petitioners”).¹ The Petitions seek a limited waiver of Section 15.117 of the Commission’s rules to allow the CE Petitioners, and any other similarly situated manufacturers, to manufacture, import, market and sell mobile digital television (“DTV”) receivers that do not include NTSC analog television tuners. In view of the unanimous support for the waiver among a broad cross-section of commenters – including manufacturers, retailers and broadcasters – CEA urges the Commission to grant the requested waiver expeditiously.

¹ Public Notice, *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*, DA 10-873 (rel. May 20, 2010).

The record in this proceeding establishes convincingly that the inclusion of analog tuners in mobile devices will only serve to add design complexity and cost to such devices without offering any countervailing public benefits.² On the other hand, as the comments make clear, a grant of the waiver will serve the public interest by facilitating the rapid deployment of innovative mobile DTV products and services that consumers will value tremendously.³

CEA agrees with the CE Petitioners, as do other commenters, that if mobile DTV receivers are to be widely available by the 2010 holiday buying season, then it is critical that the requested waiver be granted as soon as possible.⁴ Ideally, to ensure that there is sufficient time for manufacturers to ready their production lines, the waiver should be granted by early July 2010.

Finally, CEA strongly agrees with those commenters noting that there should be no confusion among consumers buying mobile DTV devices that such devices do not

² See Comments of Advanced Television Systems Committee, Inc. (June 4, 2010); Comments of the Association of Public Television Stations, the Corporation for Public Broadcasting, and the Public Broadcasting Service (June 3, 2010); Comments of the Consumer Electronics Retailers Coalition (June 4, 2010) (“CERC Comments”); Comments of Cox Media Group, Inc. (June 4, 2010) (“Cox Comments”); Comments of Dell Inc. (June 4, 2010) (“Dell Comments”); Comments of Elgato Systems, LLC (June 1, 2010); Comments of Fisher Communications, Inc. (June 4, 2010); Comments of Harris Corporation (June 4, 2010); Comments of Hauppauge Computer Works, Inc. (June 4, 2010) (“Hauppauge Comments”); Comments of Intel Corporation (June 4, 2010); Comments of Kenwood USA Corporation (June 4, 2010); Comments of LG Electronics USA, Inc. (June 4, 2010) (“LG Comments”); Comments of NagraVision (June 4, 2010); Comments of the Open Mobile Video Coalition (June 4, 2010); Comments of Roundbox Inc. (June 4, 2010); Comments of Samsung Information Systems, Inc. (June 4, 2010) (“Samsung Comments”); Comments of Sinclair Broadcast Group (June 4, 2010) (“Sinclair Comments”); Comments of Winegard Company (June 4, 2010).

³ *Id.*

⁴ See, e.g., CERC Comments at 4 (“As the Commission knows, the success of new consumer electronics products is often dependent on Holiday sales.”); Cox Comments at 4; Hauppauge Comments at 2; LG Comments at 2.

receive analog television signals.⁵ Accordingly, as suggested in CEA's initial comments, because mobile DTV devices will be marketed specifically as "Mobile DTV Receivers," CEA believes that a warning label to advise consumers that the devices do not include an analog tuner is unnecessary.

CONCLUSION

As evidenced by all of the comments filed in this proceeding, it is clear that the limited waiver of Section 15.117 as requested by the CE Petitioners is in the public interest and warrants a prompt grant. Accordingly, CEA respectfully requests that the Commission approve expeditiously the requested waiver.

Respectfully submitted,

CONSUMER ELECTRONICS ASSOCIATION

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⁵ See, e.g., Dell Comments at 4; Samsung Comments at 3; Sinclair Comments at 3.