

**BEFORE THE  
FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON, D.C. 20554**

In the Matter of	)	
	)	
Video Device Competition	)	MB Docket No. 10-91
	)	
Implementation of Section 304 of the Telecommunications Act of 1996	)	CS Docket No. 97-80
	)	
Commercial Availability of Navigation Devices	)	
	)	
Compatibility Between Cable Systems and Consumer Electronics Equipment	)	PP Docket No. 00-67

To: The Commission

**COMMENTS OF MITSUBISHI DIGITAL ELECTRONICS AMERICA**

Mitsubishi Digital Electronics America, Inc., (“MDEA”) manufactures and markets a comprehensive line of premium quality 1080p 3D DLP Home Cinema TVs and Unisen Immersive Sound LED TVs, along with the world’s first laser TV: LaserVue. Recognized as the world leader and innovator of large display high-definition televisions, Mitsubishi Digital Electronics America builds products that lead the industry in quality, performance and ease-of-use.

We are happy to comment generally on the “AllVid” Notice of Inquiry (“Notice”).<sup>1</sup>

**I. THE PUBLIC INTEREST IS SERVED BY INCREASING IP  
CONNECTIVITY TO ALL DEVICES**

Many communications mechanisms are in the process of transitioning to Internet delivery. Broadband Internet access is being studied and promoted throughout government, and the applications carried over the Internet are growing and vital. Indeed, the Commission has been quite focused on this topic.<sup>2</sup>

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<sup>1</sup> *Video Device Competition; Implementation of Section 304 of the Telecommunications Act of 1996: Commercial Availability of Navigation Devices; Compatibility Between Cable Systems and Consumer Electronics Equipment*, Notice of Inquiry, MB Docket No. 10-91, CS Docket No. 97-80, PP Docket No. 00-67, 25 FCC Rcd 4275, 75 FR 27264 (2010) (“Notice”).

<sup>2</sup> *See, e.g.*, FEDERAL COMMUNICATIONS COMMISSION, CONNECTING AMERICA: THE NATIONAL BROADBAND PLAN 49-52 (2010).

Subscription entertainment content is among the communications that are migrating to Internet and IP delivery. In 2009 MDEA introduced its first Internet connected televisions, with the launch of our Diamond line of LCD flat panel TVs featuring integrated Vudu internet media streaming. This past April, MDEA announced that the majority of our 2010 3D large screen home cinema TV models as well as all LED flat panel TV models will integrate the newly launched VUDU Apps service, which features VUDU movies and more than 100 other Internet-delivered applications.<sup>3</sup> In addition to instant streaming of thousands high definition movie titles, the Vudu Apps delivers exciting streaming media and communications applications such as Pandora, Picasa, Flickr, Twitter and Facebook along with a host of news and entertainment services.<sup>4</sup>

We believe that over-the-top services, entertainment services that are delivered “over the top” of a consumer’s broadband Internet connection, are quickly supplementing traditional MVPD video delivery. Indeed, the poor support of the confining and constrained CableCARD system has turned attention to the over-the-top marketplace. We are now aggressively innovating television internet and networking capabilities.

We believe that the entertainment content delivery mechanisms will continue to evolve towards IP and Internet connectivity. Internet communications will continue to spread into consumer electronics, beyond just the personal computer, and become even more pervasive. The Commission should plan for and encourage this natural evolution of digital entertainment connectivity.

In the Fourth Further Notice, the Commission tentatively concluded that enabling connectivity between MVPD set-top boxes and IP devices in consumers’ homes serves the public interest.<sup>5</sup> We agree, and particularly agree in the context of the AllVid system. The Commission should act to promote IP and Internet connectivity.

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<sup>3</sup> Press Release, Mitsubishi Digital Electronics America, Inc., Mitsubishi Digital Electronics America Expands Relationship with VUDU, Adds VUDU Apps to All Models in its New Line of Internet-enabled HDTVs (Jan. 6, 2010), available at [http://www.mitsubishi-tv.com/pdf/PR/MDEA-VUDUCES%20Release\\_122409.pdf](http://www.mitsubishi-tv.com/pdf/PR/MDEA-VUDUCES%20Release_122409.pdf).

<sup>4</sup> See <http://www.vudu.com/vuduapps.html>.

<sup>5</sup> *Implementation of Section 304 of the Telecommunications Act of 1996: Commercial Availability of Navigation Devices; Compatibility Between Cable Systems and Consumer Electronics Equipment*, Fourth Further Notice of Proposed Rulemaking, CS Docket No. 97-80, PP Docket No. 00-67 (“*Fourth Further Notice*”) at ¶ 20.

The AllVid system, focused on providing a mechanism to bridge proprietary network video delivery (cable, telco and satellite) onto an IP home network using open standards, will serve the public interest.

## **II. THE STANDARDS IDENTIFIED FOR THE ALLVID SYSTEM ARE GOOD CHOICES**

The *Notice* identifies a set of technologies as suitable for use in the AllVid system. These include Ethernet, IP, and DTCP-IP.<sup>6</sup> These standards form the basis for both the Internet (Ethernet and IP) and secure home networked video delivery (DTCP-IP).

We agree that these technologies should form the basis for an AllVid home video network. Such an architecture would encourage IP-connected televisions to have the capability to access MVPD content, at a much lower cost and potentially greater functionality than the CableCARD system.

## **III. ENCOURAGING NAVIGATION DEVICE COMPETITION IN THE MARKETPLACE**

As most agree, the CableCARD system has failed to produce significant meaningful competition in the marketplace.<sup>7</sup> We applaud the Commission's continuing efforts to successfully implement Section 629 of the Telecommunications Act, but caution that the AllVid system should be carefully shepherded so that it doesn't fall victim to the same monopolistic and manipulative actions of the entrenched vendors and operators.

We were an early proponent of the CableCARD, and participated with great hope in the bilateral negotiations that led to the Memorandum of Understanding that set out the technical framework for the CableCARD system. Unfortunately, hoping and planning for the operators' acquiescence to competition was not enough. The Commission should take great care to develop regulations that enable the AllVid system to succeed, even in the face of MVPD attempts to subvert it or detract from its usefulness. In doing so, the Commission should replicate the safeguards against service operator economic and technical support discrimination that it is considering in the Fourth FNPRM.

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<sup>6</sup> *Notice* at ¶¶ 26-28.

<sup>7</sup> *See supra* note 2 at 50.

#### **IV. CONCLUSION**

The Internet will be the dominant communications mechanism of the 21<sup>st</sup> century. Commercial entertainment and informational content as well as media-rich communications are becoming more readily accessible on the Internet, and this access will continue to grow. The Commission should continue to encourage better integrated IP connectivity to home entertainment devices, such as televisions and set-top boxes. The AllVid system proposed in the *Notice* is a very good start, and we look forward to participating in the further development of the AllVid system and smart video devices. We caution, however, that commercial interests may attempt to derail this effort – before and after regulations are enacted – so the Commission should adopt strong regulations and be prepared to enforce them in order to avoid a CableCARD-like failure and ensure the success of the AllVid system.

Respectfully submitted,

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July 13, 2010