

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)	
)	
Commercial Availability of Navigation Devices)	CS Docket No. 97-80
)	
Compatibility Between Cable Systems and)	PP Docket No. 00-67
Consumer Electronics Equipment)	

COMMENTS OF CTB GROUP, INC.

1. CTB Group, Inc. (“CTB”) hereby submits these comments in response to the Commission’s Notice of Inquiry in the above-captioned proceedings, FCC 10-60, released April 21, 2010. CTB has developed technology that allows a digital television broadcast station to provide both television and broadband services simultaneously over a single 6 MHz TV channel. It becomes a highly efficient, high capacity system when TV channels are combined into a multi-frequency network. The technology works within the existing ATSC technical standard and so can operate under existing ancillary service rules,¹ including maintaining a free, over-the-air digital broadcast program stream.² It allows broadcasters to deliver two-way interactive broadband today, with less cost and higher quality than other providers, and without altering the Commission’s Rules or disrupting other services.

2. Implementation of CTB’s technology will require set-top equipment, at least unless and until television receiver manufacturers choose to build additional functionality into their

¹ See Section 73.624(c) of the Rules.

² See Section 73.624(b) of the Rules.

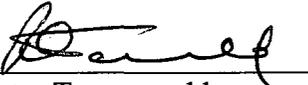
products. This equipment will both decrypt those services which require a subscription and will convert various modulation schemes for display on conventional ATSC receivers.

3. CTB would like the Commission to know that it has no objection to a regulatory regime that separates decryption from demodulation and encourages a competitive marketplace for demodulation equipment. While parts of CTB's technology are proprietary, CTB's business plan does not depend on control of set-top equipment production or distribution. CTB will support multiple manufacturers and will not attempt to discourage consumers from buying or leasing their own set-top equipment from competitive sources.

4. CTB's broadband distribution will also require caching of content at the subscriber's premises. Whether that caching is done by equipment supplied by CTB or equipment obtained from other sources is not an issue of concern to CTB and is a decision that can be made by the consumer.

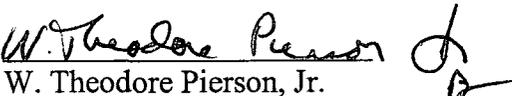
5. In sum, CTB supports the Commission's goal of promoting a competitive marketplace for consumer reception equipment.

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