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Digital Living Network Alliance

REDACTED FOR ECFS

April 3, 2012

VIA ECFS

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: *In the Matter of Video Device Competition*, MB Docket No. 10-91; CS Docket No. 97-80; PP Docket No. 00-67

Dear Ms. Dortch:

Motion for Confidential Treatment

Please treat this cover letter as a Motion for Confidential Treatment of Supplied Information in MB Docket No. 10-91; CS Docket No. 97-80; PP Docket No. 00 67. The attached publication, while generally available to members of the Digital Living Network Alliance® (“DLNA”), is a published work which is sold to the general public for a fee. We recognize, however, that the Commission should like to refer to these documents during its deliberation on this matter and are therefore supplying this advance copy of this document to the Commission without charge.

However, we do hereby request that these publications be treated as ‘confidential’, in the meaning of Section 0.459 of the Commission’s rules. These publications are sold to the public, and routine publishing of these documents via ECFS would significantly affect its market value and cause harm to DLNA – but availability for public inspection via viewing in person need not be limited (and, as noted above, these documents are available to the general public for a reasonable fee).

If this motion is denied, please return the attached materials to me at the above address.

Background

DLNA was founded in 2003, and is comprised of more than 200 industry leading consumer electronics, personal computing, mobile device, MVPD and entertainment companies who share the common goal of creating products that are compatible through the use of open standards and widely available industry specifications that are based on Internet Protocols (IP). DLNA’s Promoter Members include: ACCESS, AT&T, AwoX, Broadcom, CableLabs, Cisco, Comcast, DIRECTV, DTS, Dolby Laboratories, Ericsson, HP, HTC, Huawei, Intel, LG, Microsoft, Motorola, Nokia, Panasonic, Qualcomm, Samsung, Sony, Technicolor and Verizon. DLNA participants include broad representation from MVPDs, consumer electronics, information technologies and content industries.

On June 29, 2007 the Commission released the Third Further Notice of Proposed Rulemaking in CS Docket 97-80.¹ On August 24, 2007, several companies filed joint comments collectively as the Home Networking Proponents advocating that the Commission adopt Guidelines published by the Digital Living Network Alliance.² On November 14, 2007, the Home Networking Proponents supplied the Commission with the then-current version of DLNA Guidelines.³

On December 3, 2009 the Commission released NBP Public Notice #27, seeking comments on video device innovation.⁴ DLNA submitted comments responsive to Public Notice #27,⁵ and separately provided the Commission with the then-current version of the DLNA Guidelines.⁶ DLNA has similarly submitted comments in response to the *Fourth Further Notice*,⁷ and the *AllVid NOI*.⁸

On May 17, 2011, DLNA wrote to the Commission announcing that it had completed work on the 2011 guidelines for commercial video content, and supplied the Commission with a pre-publication copy of the Device Profile for DLNA Premium Video.⁹

Update on delivering DLNA Premium Video

DLNA is pleased to inform the Commission that DLNA has published a revision of the DLNA Guidelines that includes updates and additional functionality, including the final publication version of the Device Profile for DLNA Premium Video. This Device Profile specifies a set of requirements for delivery of commercial content to DLNA devices, including protected streaming (DTCP-IP Link Protection), and comprehensive trick-mode support (pause, rewind, fast forward). These guidelines also include support for both MPEG-2 video and H.264/AVC video codecs carried via a MPEG-2 Transport Stream. Attached is the published set of DLNA Guidelines (December, 2011).

DLNA is finalizing a certification program for these guidelines, which we expect will be available in 2012. The certification program will enable testing for verified interoperability between devices. Additionally, DLNA continues to develop new guidelines to respond to marketplace trends and consumer demands, and we will continue to inform the Commission when new guidelines are finalized.

¹ *Implementation of Section 304 of the Telecommunications Act of 1996: Commercial Availability of Navigation Devices; Compatibility Between Cable Systems and Consumer Electronics Equipment*, Third Further Notice of Proposed Rulemaking (rel. June 29, 2007).

² *Joint Comments of the Home Networking Proponents on Third Further Notice of Proposed Rulemaking*, CS Docket No. 97-80, PP Docket No. 00-67 (August 24, 2007).

³ Letter from Adam Goldberg, Vice President, Government and Industry Relations, Pioneer North America to Marlene H. Dortch, Secretary, Federal Communications Commission, CS Docket No. 97-80 (Nov. 14, 2008) (transmittal letter and motion for confidential treatment of DLNA Guidelines dated Oct., 2006 and Sep. 2005).

⁴ Public Notice, *Comment Sought on Video Device Innovation*, NBP Public Notice #27, DA 09-2519 (rel. Dec. 3, 2009).

⁵ *Comments of the Digital Living Network Alliance*, GN Docket Nos. 09-47, 09-51, 09-137; MB Docket No. 97-80 (Dec. 21, 2009).

⁶ Letter from Donna Moore, Executive Director, Digital Living Network Alliance to Marlene H. Dortch, Secretary, Federal Communications Commission, GN Docket Nos. 09-47, 09-51, 09-137; MB Docket No. 97-80 (Dec. 22, 2009).

⁷ *In the Matter of Implementation of Section 304 of the Telecommunications Act of 1996*, 25 FCC Rcd 4303, 75 FR 27256, CS Docket No. 97-80, PP Docket No. 00-67 (rel. Apr. 21, 2010).

⁸ *In the Matter of Video Device Competition*, 25 FCC Rcd 4275, 75 FR 27264, MB Docket No. 10-91, CS Docket No. 97-80, PP Docket No. 00-67 (rel. Apr. 21, 2010).

⁹ Letter from Donna Moore, Executive Director, Digital Living Network Alliance to Marlene H. Dortch, Secretary, Federal Communications Commission, MB Docket No. 10-91, CS Docket No. 97-80, PP Docket No. 00-67 (May 17, 2011) (transmittal letter and motion for confidential treatment of DLNA Guidelines for commercial video content).

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We believe that publication of these guidelines is a step forward in enabling secure availability of commercial content offered by MVPDs to retail devices and interoperability of commercial video in the home. Please feel free to contact me if I may be of further assistance.

Regards,

/s/

Donna Moore
Executive Director

Enclosures (5)

cc: Alison Neplokh
Henning Schulzrinne



DLNA Guidelines

December 2011

Part 1: Architectures and Protocols

An Industry Guide for
Building Interoperable
Platforms, Devices,
and Applications

Fulfilling the promise of the digital home requires a cross-industry effort to develop and promote a common industry framework for interoperability. This industry framework is expressed through the DLNA Guidelines document that has been developed to provide Consumer Electronic, Mobile Device and PC companies with the information needed to build interoperable platforms, devices, and application for the digital home.

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DLNA Guidelines

December 2011

Part 2: Media Formats

An Industry Guide for
Building Interoperable
Platforms, Devices,
and Applications

Fulfilling the promise of the digital home requires a cross-industry effort to develop and promote a common industry framework for interoperability. This industry framework is expressed through the DLNA Guidelines document that has been developed to provide Consumer Electronic, Mobile Device and PC companies with the information needed to build interoperable platforms, devices, and application for the digital home.

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DLNA Guidelines

December 2011

Part 3: Link Protection

An Industry Guide for
Building Interoperable
Platforms, Devices,
and Applications

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DLNA Guidelines

December 2011

Part 4: DRM Interoperability Solutions

An Industry Guide for
Building Interoperable
Platforms, Devices,
and Applications

Fulfilling the promise of the digital home requires a cross-industry effort to develop and promote a common industry framework for interoperability. This industry framework is expressed through the DLNA Guidelines document that has been developed to provide Consumer Electronic, Mobile Device and PC companies with the information needed to build interoperable platforms, devices, and application for the digital home.

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DLNA Guidelines

December 2011

Part 5: Device Profiles

An Industry Guide for
Building Interoperable
Platforms, Devices,
and Applications

Fulfilling the promise of the digital home requires a cross-industry effort to develop and promote a common industry framework for interoperability. This industry framework is expressed through the DLNA Guidelines document that has been developed to provide Consumer Electronic, Mobile Device and PC companies with the information needed to build interoperable platforms, devices, and application for the digital home.

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