

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

In the Matter of)	
)	
TiVo Inc.)	
Petition for Clarification or Waiver)	MB Docket No. 12-230
of 47 C.F.R. §76.640(b)(4))	
)	
Implementation of Section 304 of the)	
Telecommunications Act of 1996;)	
Commercial Availability of Navigation)	CS Docket No. 97-80
Devices)	

Reply Comments of The RVU Alliance

The RVU Alliance submits these reply comments to TiVo’s request for waiver of the audiovisual output requirement.¹ We would like to highlight to the Commission that not only is the RVU open industry standard compliant with the Audiovisual Output Requirement of Section 76.640(b)(4)(iii), but furthermore that this RVU technology is available for companies to implement and deploy today.

¹ *Media Bureau Seeks Comment on TiVo’s Request for Clarification and Waiver of the Audiovisual Output Requirement of Section 76.640(b)(4)(iii)*, Public Notice, MB Docket No. 12-230, DA 12-1347 (MB rel. Aug. 16, 2012) (“*Public Notice*”). Petition of TiVo Inc. for Clarification or Waiver of 47 C.F.R. § 76.640(b)(4)(iii), filed July 25, 2012. (“*TiVo Petition*”). Section 76.640(b)(4)(iii) of the Commission’s rules requires cable operators to “ensure that ... cable-operator-provided high-definition set-top boxes, except unidirectional set-top boxes without recording functionality, ...comply with an open industry standard that provides for audiovisual communications including service discovery, video transport, and remote control command pass-through standards for home networking” by December 1, 2012.

About the RVU Alliance

The RVU Alliance is an Oregon-based non-profit mutual benefit corporation formed to develop a specification for the RVU technology including a full-featured “pixel accurate” Remote User Interface (RUI). Founding Promoter members are Broadcom, Cisco, DIRECTV, Samsung and Verizon. Other Promoter members are BSkyB, Entropic, Humax, JetHead Development Inc, Pace PLC, Qualcomm-Atheros, Sigma Designs, Sky Brasil, ST Microelectronics, Technicolor and Trident Microsystems.² Comprised of service providers, consumer electronics manufacturers and technology providers striving toward the common goal of ensuring whole home premium television entertainment for consumers’ devices, the RVU Alliance has developed a complete specification and certification capability to facilitate the development and deployment of interoperable RVU certified devices.

RVU Complies with the Commission’s Audiovisual Output Requirement

The Audiovisual Output Requirement of Section 76.640(b)(4)(iii) requires “an open industry standard that provides for audiovisual communications including service discovery, video transport, and remote control command pass-through standards for home networking.” The RVU technology provides the full functionality required by the Commission, requiring Internet Protocol (IP) connectivity, service discovery built from UPnP and DLNA protocols, a remote commanding protocol, and industry standard media formats. RVU also includes functionality needed to address MVPD and content provider requirements: a Remote User Interface (RUI)

² See www.rvualliance.org

functionality that allows the user of a connected client device to navigate through user screens generated by a compatible RVU server, as well as DTCP-IP content protection. Underscoring its benefits, the RVU RUI has been adopted by DLNA into its Interoperability Guidelines.³

RVU Is Available Today

The Version 1.0 RVU Specification has been publically available since Fall 2009 and a comprehensive certification logo program has been in place since Spring 2011. RVU implementations are being demonstrated on a wide variety of technology platforms, and winning awards at major trade shows and conferences around the world. Most importantly, RVU devices have been fielded to consumers nationwide since Fall 2012, in the form of HR34 Home Media Center servers and clients from DIRECTV as well as RVU-certified Smart TVs from Samsung.⁴

The award-winning RVU technology benefits service providers, consumer electronics manufacturers and consumers alike. The RVU Alliance appreciates this opportunity to submit these reply comments.

³ See <http://www.dlna.org/docs/press-releases/rvu-alliance-remote-user-interface-now-included-in-dlna-interoperability-guidelines.pdf>

⁴ The latest information about implementations, demonstrations, deployments and awards can be found at www.rvualliance.org/news

Respectfully submitted,

RVU ALLIANCE

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