

June 14, 2004

To: All Members of the Advanced Television Systems Committee

Dear ATSC Member,

The purpose of this letter is to urge you to vote “No” on this ballot of PS T3-596r1 (Annex D), the proposed modification to the transmission portion of the ATSC A/53 Digital Television Standard regarding Enhanced VSB (“E-VSB”)¹.

The Consumer Electronics Association (CEA) believes that the appropriate treatment of this E-VSB proposal, for now, is to publish it as a Candidate Standard. Unfortunately, however, in order for PS T3-596r1 to be given Candidate Standard status under ATSC procedures, the present ballot must first be defeated. We say “unfortunately” because continued constructive dialog between broadcasters and CE manufacturers, such as was evident at two recent E-VSB discussion meetings, is very important to us.

We acknowledge that a set of amendments to the ATSC Digital Television Standard that also involves transport and audio/video codecs may represent a helpful improvement, and may create new business opportunities for CE manufacturers and broadcasters alike. However, great care must be taken before introducing any change to the ATSC system as fundamental as those proposed on this ballot. To use E-VSB, the broadcaster must sacrifice to it some percentage of the 19.4 Mbps bandwidth. This change is considered “fundamental” because every bit of data sent using the E-VSB scheme is a bit of data not available to existing receivers, as well as the tens of millions of receivers the CE industry will ship in the next two years.

At Candidate Standard level, T3-596r1 can be tested to determine whether it delivers the expected enhancements, namely whether it performs under a low SNR/dynamic multipath reception environment. The CS T3-596r1 can await the remaining elements of a complete proposal for enhanced VSB. This entire system can then be tested, and industry plans made for its deployment in the marketplace. If this can be done, with the resulting benefits known and agreed upon by both broadcasters and CE manufacturers, the entire sub-system could then be presented for approval as an additional mode for use with the original ATSC DTV standard.

¹ This position is not shared by CEA members Hitachi, Toshiba and Zenith.

June 10, 2004

Page 2

Until expected system performance is assured, specific applications are defined and broadcasters commit to their deployment, it is unrealistic to manufacturers to build this new receiver capability into consumer DTV receivers, or receivers of any kind. Approving the proposed change to the standard under such conditions of uncertainty can only be harmful to the current transition to DTV. It creates expectations that may never be met, with negative effects on the public's understanding of, and confidence in, terrestrial DTV broadcasting.

Approval of this modification to the ATSC DTV standard at this time is also troublesome to CE manufacturers because news of such a change to the standard may lead consumers to believe that E-VSB will provide exciting new service capabilities in the future, despite the current lack of identified applications or services. Faced with the promise of future services, but without details as to their type, content, or date of introduction, consumers may be inclined to delay purchasing digital television receivers with ATSC reception capability until the situation is clarified.

In summary, CEA believes it is premature to finalize a change to the ATSC DTV standard when so much about the change remains uncertain. For instance, the ATSC is not yet ready to offer for membership approval planned standards it is considering for transport and audio/video encoding/decoding technology. The video codecs themselves are still being tested, and it is unclear even whether one or two video codecs might be proposed as part of this E-VSB sub-system. The entire E-VSB sub-system, including transmission, transport and A/V codecs can be presented as a whole at some future time, if it gains the joint support of broadcasters and consumer electronics manufacturers.

Please join us in voting "No" on this proposed change to the ATSC DTV Standard so that Annex D (revised) may be moved to Candidate Standard level. Further information regarding technical concerns is available by contacting Brian Markwalter, CEA, bmarkwalter@ce.org.

Sincerely

A handwritten signature in black ink, appearing to read "M. Petricone".

Michael Petricone
Vice President, Technology Policy
Consumer Electronics Association