

Pioneer Comments on E-VSB Revisions to A/53B Annex D

Submitted with our ballot on July 13, 2004

Although Pioneer is supportive of attempts to improve industry standards, Pioneer has a number of concerns regarding adoption of E-VSB Revisions to A/53B Annex D as a Recommended Standard at this time. Primary among these concerns are the following:

- 1) Revisions to A/53B Annex D to cover E-VSB do not fully define the E-VSB system. We are generally opposed to any piecemeal approach that prevents evaluation of a full system before approving it as a Recommended Standard.
- 2) Some have expressed concerns about how robust the E-VSB system really is. Until such concerns are countered effectively, it seems premature to adopt E-VSB as a Recommended Standard. In addition, others have proposed one or more alternative approaches that might prove more effective than E-VSB. Consideration of those alternatives should be allowed up to the time that the full E-VSB system is complete and ready for adoption.
- 3) The DTV transition is still young and may be adversely affected by allowing new optional capabilities at this time. It is, of course, impossible to accurately gauge such affects. However, it seems quite possible that changing standards now could create dissatisfaction among owners of legacy DTV receivers, and could even dampen sales of CE products until the complete E-VSB system is finalized, implemented and available to consumers. We can avoid much of this uncertainty by simply waiting to advance E-VSB to a Recommended Standard until the full E-VSB system is ready.

Pioneer is not opposed to adopting enhancements to existing standards. We are, however, very concerned that such enhancements be considered carefully. We believe that all aspects of such enhancements should be coordinated, and prefer using a Candidate Standard approach for most pieces until all others are ready. We are therefore voting No on this ballot to allow further time to finalize such improvements to the DTV system.