



September 25, 2006

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DOCKET No. 060512129-6129-01)

IN THE MATTER OF ATSC A/74 PERFORMANCE STANDARDS FOR DIGITAL SET-TOP BOX CONVERTER

PROGRAM REPLY COMMENTS OF MICROTUNE, INC.

Microtune®, Inc. respectfully submits its comments in response to the *Notice of Proposed Rulemaking to Implement and Administer a Coupon Program for Digital-to-Analog Converter Boxes*, the above referenced docket.

BACKGROUND ON MICROTUNE

Microtune is a radio frequency (RF) silicon and systems company headquartered in Plano, TX. The Company supplies worldwide customers television tuners that are targeted for cable modems, telephony modems, cable set-top boxes, automotive entertainment systems, and digital television sets. Because of its expertise in RF receiving technology, Microtune understands the technical and consumer impact of industry-accepted standards, such as ATSC, to the quality/cost of TV reception.

THE NTIA SHOULD ENSURE THAT ATSC A/74 RECEIVER-PERFORMANCE GUIDELINES ARE ADOPTED

The NTIA is proposing that digital-to-analog converter boxes meet the A/74 Receiver Performance Guidelines adopted by the Advanced Television Systems Committee (ATSC). Microtune strongly supports the NTIA position.

The establishment of minimum receiver performance standards for digital converter boxes critically serves the public interest in a number of ways.

- The tuner-receiver performance is critical to the quality of the consumer TV experience. DTV receiver performance is a key factor in dictating if TV households can receive a stable, consistent digital TV picture. In many cases, the receiver (tuner) is the determining factor in whether or not consumers can receive DTV signals at all in their geographical area. For all US households to receive a minimal level of receiver performance, regardless of the price of their DTV equipment, the A/74 guidelines must be implemented as a base-line standard.

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- The ATSC A/74 Guidelines are designed to ensure the front-end portion of a digital terrestrial receiver is able to achieve reliable reception.
- The NTIA, in proposing the A/74 guidelines, has placed strong emphasis on the ultimate cost to consumers. Microtune believes that there is no cost penalty for deploying tuner/receivers in equipment that offers ATSC A/74 compliance. The Company currently offers a three-in-one (analog, digital, cable) tuner, developed specifically for the US market, that is A/74 compliant. This tuner is available today at a competitive price compared to tuners that do not offer A/74 compliance. Consumers will not have to bear additional cost as a principal factor in the acceptance of A/74 Guidelines as a receiver performance standard.

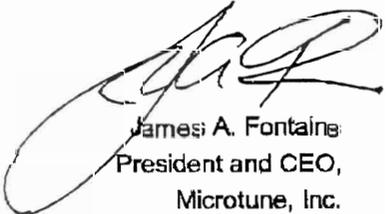
The U.S. government and private industry, as well as consumers in their DTV purchases, are collectively investing billions of dollars to effect the U.S. transition to digital television. To realize this investment, to ensure a minimal level of DTV performance for all households, and to support the legislative imperative, Microtune believes that A/74 receiver performance standards should be mandated for all DTV products.

MICROTUNE COMMENTS ON OTHER RECOMMENDATIONS

Microtune strongly recommends that the NTIA proposal be considered by other government agencies as a consistent policy that is applied to DTV receivers in all digital TV products. These products include digital and high-definition television sets, DVD recorders, Personal Video Recorders, satellite set-top boxes or other TV peripherals that contain tuners to receive off-air digital broadcasts.

Microtune also recommends that appropriate government agencies adopt rules for the labeling of digital television receivers that conform to A/74 technical parameters. The labeling scheme will permit consumers to make well-informed decisions about DTV equipment purchases based on a clear understanding of the capabilities of receivers to meet ATSC performance guidelines.

Microtune appreciates the opportunity to comment on issues that we believe are important to consumers, to telecommunications and consumer electronics industries and to U.S. companies.



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CC: The Honorable Joe Barton,
Chairman,
Committee on Energy and Commerce