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July 9, 2026

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
45 L Street, NE
Washington, D.C. 20054

*Re: Authorizing the Permissive Use of the "Next Generation" Broadcast Television Standard (GN Docket No. 16-142)*

Dear Ms. Dortch,

Silicondust USA, Inc. submits this Ex Parte notice regarding communication with Media Bureau members.

Weigel Broadcasting Company's June 4 Ex Parte filing raised the question of whether consumers could continue receiving Emergency Alert System (EAS) messages carried on DRM encrypted ATSC 3.0 broadcast channels during an Internet outage. Subsequent filings by the National Association of Broadcasters, the A3SA, and Digital Alert Systems have evolved the discussion. Those parties consistently recognize that viewers should continue receiving broadcast television—including Emergency Alert System (EAS) messages—when broadband connectivity is unavailable.

Silicondust agrees that viewers must be able to tune and view broadcast-delivered television channels during an Internet outage.

Unlike receivers that connect directly to a television using HDMI, gateway receivers receive broadcast television and make it available over the consumer's home network for viewing on the same popular player devices they already own and use.

Silicondust's HDHomeRun products implement this architecture by receiving broadcast television channels and making them available on popular player devices over the customer's home Ethernet or WiFi network. This architecture necessarily assumes the presence of a home router. Initial installation of the HDHomeRun app occurs through the player-platform's app store (Roku, Google, Amazon, Apple, or Microsoft store), which ordinarily requires Internet access. Once installed, however, the relevant issue raised in this proceeding is whether broadcast television can continue to operate during a subsequent Internet outage.

In the event of an Internet outage, the owner's Ethernet and WiFi home network will continue to function for devices operating within the home.

As of the date of this letter, the latest HDHomeRun app releases support tuning and viewing television channels with or without Internet on the following platforms:

- Roku devices and Roku based TVs
- Android TV devices and Android based TVs
- Fire TV devices and Fire TV based TVs
- Apple TV devices
- Google TV devices
- XBox consoles
- Apple iPhones and iPads
- Android phones and tablets
- Mac and Windows computers

ATSC 1.0 channels can be tuned and viewed with or without Internet.

ATSC 3.0 channels that are not DRM encrypted, and that are delivered over the broadcast, can be tuned and viewed with or without Internet.

Accordingly, Silicondust already demonstrates that broadcast television can continue to operate during an Internet outage using the HDHomeRun video gateway architecture.

The remaining limitation is confined to DRM encrypted channels. That limitation does not affect ATSC 1.0 channels or ATSC 3.0 channels that are not DRM encrypted.

In its June 26 filing, the A3SA states that properly implemented receivers "receive, decrypt, and display broadcast programming and EAS messages without a full-time internet connection."

Silicondust is not aware of any A3SA-approved approach that is deployable for gateway receivers to support popular player devices using installable apps while operating without Internet.

To the best of Silicondust's knowledge, the only A3SA-approved approach that supports operation during an Internet outage requires a purpose-built player device provisioned by the manufacturer with A3SA keys during manufacturing. That approach cannot be implemented by an installable app on the popular player devices that today support unencrypted ATSC 3.0 channels.

Accordingly, the remaining limitation is not the HDHomeRun gateway architecture. Rather, no deployable A3SA-approved approach presently enables DRM encrypted channels to be made available to popular player devices with the same Internet-outage compatibility as unencrypted broadcast channels.

This proceeding demonstrates substantial agreement among participants that viewers should continue receiving broadcast television and emergency information during an Internet outage. Silicondust recommends broadcasters temporarily disable DRM encryption on broadcast channels until the A3SA demonstrates and makes available a deployable approach that allows DRM encrypted channels to operate with the same compatibility as unencrypted channels during an Internet outage.

Silicondust is not aware of any material disadvantage to consumers or broadcasters associated with temporarily transmitting these broadcast channels without DRM encryption while the ecosystem develops and deploys a broadly compatible solution that preserves television reception during Internet outages. Silicondust respectfully suggests that the Commission encourage broadcasters to adopt this interim measure.

Silicondust further respectfully suggests that, before considering rule changes that would relax the current "substantially similar" requirement, at least one of the following should occur first: broadcasters should temporarily disable DRM encryption on broadcast channels, or the A3SA should make available a deployable approach that provides equivalent Internet-outage compatibility for DRM encrypted channels.

I thank the members of the Media Bureau for their time reviewing this information. Representatives of Silicondust are available to answer any questions the FCC might have regarding DRM and/or ATSC 3.0.

Sincerely,

Nicholas J Kelsey, President
Silicondust USA, Inc.

cc: Hillary DeNigro
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