



Nicholas J Kelsey
Silicondust USA, Inc
2150 Portola Ave, Suite D #143
Livermore, CA 94551
nickk@silicondust.com

July 29, 2025

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

Re: Pearl Ex Parte Letter dated July 25, 2025

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

Dear Ms. Dortch,

Silicondust offers the following response to Pearl TV's letter dated July 25, 2025.

Pearl continues to push this false narrative.

Pearl says:

"In order for a device to access all the features of ATSC 3.0 and high-value content, the device must have a Widevine Level 1 CDM (Content Decryption Module) integrated into the underlying SoC (System on a Chip). This Level 1 CDM is standard in the industry and is used by many online video providers. The HDHomeRun device does not have the requisite Level 1 CDM license, hence the inability of the device to access high-value content."

Silicondust is not required or expected to have the Level a CDM license described by Pearl. Silicondust recommends that Pearl consult with the ATSC 3.0 Security Authority (A3SA) to understand why the Widevine Level available to the SoC in a video gateway device, such as the HDHomeRun product, is not relevant in any way to viewers accessing "high-value content".

Pearl says:

This information was set before the Commission to explain why "SiliconDust [has been] unable to include key ATSC technologies owned by various U.S. companies that otherwise would enable it to directly operate with major equipment and technology companies for various features, and that SiliconDust is unable to obtain a security verification to display all ATSC 3.0 content."

Silicondust is not aware of any situation matching this description. The ATSC 3.0 Security Authority (A3SA) has not raised any concerns with Silicondust.

Pearl says:

SiliconDust's business decision to use the Huawei chip explains why the several thousand U.S. users of HDHomeRun devices will have challenges accessing the full scope of ATSC 3.0 content.

Silicondust recommends that Pearl consult with the ATSC 3.0 Security Authority (A3SA) to understand

why the SoC part used in a video gateway device, such as the HDHomeRun product, is not relevant in any way to viewers accessing ATSC 3.0 content.

Pearl says:

By contrast, the 15 million receivers currently in the market with the security verification enjoy access to all the audio and video features of ATSC 3.0 and high-value content

15 million televisions, zero gateway devices. Gateway devices are being targeted with special rules and requirements not required of televisions as Pearl confirms later in their letter.

These special rules and requirements prevent any video gateway device from working with the wide range of televisions and player devices people enjoy using to watch unencrypted ATSC 3.0 content from their HDHomeRun video gateway today. **These special rules and requirements go so far as to prevent American viewers from using television and player devices that have been Nextgen TV certified, specifically when the content is sourced from a video gateway device.** Further, these invented rules and requirements came seven months after Silicondust had successfully completed NextGen TV certification of a number of player devices, with the list of certified player devices being well known.

It should also be noted that the majority of these 15 million televisions do not receive ATSC 3.0 content by virtue of the fact that the majority of televisions never get connected to an antenna. A better metric for ATSC 3.0 adoption is the sale of set-top-box and video gateway products. The HDHomeRun video gateway is the best selling ATSC 3.0 receiver box on Amazon, outselling set-top-boxes.

Pearl says:

In order for a device to access all the features of ATSC 3.0 and high-value content, the device must have a Widevine Level 1 CDM (Content Decryption Module) integrated into the underlying SoC (System on a Chip).

Silicondust recommends that Pearl consult with the ATSC 3.0 Security Authority (A3SA) to understand Widevine levels allowed by the A3SA and why this claim is not true.

Pearl says:

The HDHomeRun device does not have the requisite Level 1 CDM license, hence the inability of the device to access high-value content.

Silicondust recommends that Pearl consult with the ATSC 3.0 Security Authority (A3SA) to understand Widevine levels allowed by the A3SA and why the Widevine Level available to the SoC in a video gateway device, such as the HDHomeRun product, is not relevant in any way to viewers accessing “high-value content”.

Pearl says:

Lastly, we want to address the point that gateway tuning devices have not yet been approved. The security verification authority (A3SA) has worked to facilitate the entry of gateway devices by updating its specifications in 2023 to include a mechanism for a local inhome distribution to support gateway solutions. The in-home distribution specification (entitled, ATSC 3.0 Security Authority Device Security Specification PART 2: Local Content Protection (ALCP)) was developed in collaboration with several gateway manufacturers. Despite the presence of this mechanism in the market for nearly two years, we are well aware that no gateway device has been submitted for approval, [...]

First a correction to the date - the specification became available February 26, 2024 as per A3SA's public statement available to read on the A3SA website:

February 26, 2024 – A new digital video recorder (DVR) specification is now available to licensees of the A3SA content protection technology [...] that will allow innovators to develop new products for home networks

Silicondust's conclusion, from reading the above specified A3SA document, is that there is no pathway whereby a video gateway vendor could write an app for Roku, Xbox, Apple TV, iPhone, iPad, Windows, or Mac supporting protected channels. The Android requirements seem unnecessarily onerous and block third party apps from working with the HDHomeRun as they do today. While another vendor may choose to limit their customers' choice of player devices to a select number of blessed models and with customers locked into using that vendor's supplied app, **Silicondust cannot disenfranchise the majority of our customers in this way.**

We look forward to working with the commission on finding a solution and are always available to answer any questions.

Sincerely,

Nicholas J Kelsey – President
Silicondust USA, Inc.

Mailing address:
2150 Portola Ave, Suite D #143
Livermore, CA 94551

cc: Erin Boone
Deena Shetler
Jessica Kinsey
Media Bureau
Hillary DeNigro
Maria Mullarkey
Evan Morris
Evan Baranoff
Nancy Murphy
Consumer and Governmental Affairs Bureau
Eduard Bartholme
Mark Stone
Wesley Platt
James Brown
Enforcement Bureau
Patrick Webre
Alice Jou