



August 14, 2014

VIA EMAIL AND U.S. MAIL

Institute of Electrical and Electronics Engineers
Standards Association
Attention: David Ringle, Director, IEEE-SA Governance
445 Hoes Lane
Piscataway, NJ 08854-4141
d.ringle@ieee.org

Re: Proposed Clarifications to IEEE By-Laws

Dear Mr. Ringle,

VIZIO is a leading designer of televisions and other consumer electronics. Increasingly, the products we develop are enabled with Wi-Fi, which consumers increasingly use to stream video and other content around their homes.

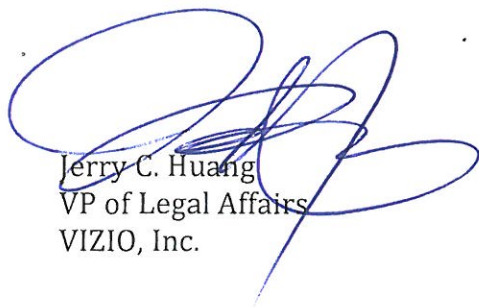
Unfortunately, we are aware of frequent disputes involving the licensing of patents that are claimed to be required to implement IEEE standards. Wi-Fi functionality is important to our products and our customers. For that reason, the issuance of an injunction or exclusion order that limits the use of Wi-Fi would have a serious impact on our customers.

We are aware of the IEEE Standards Association's discussion of clarifications to the provisions of the IEEE By-Laws concerning the use of patented inventions in IEEE standards. We support the changes, which will limit the circumstances when injunctions and other exclusion orders would be available against our company and the suppliers that provide us with components we use to add Wi-Fi functionality to the televisions we design. We also welcome the effort to further define what licensing terms are consistent with the requirement that owners of patents required to implement IEEE standards grant licenses on reasonable and non-discriminatory terms. We are aware that some owners of patents that are claimed to be required to implement Wi-Fi, often companies that have acquired patents from past participants in IEEE standards development, have sought grossly excessive royalties from consumer electronics companies. The proposed revisions would help our company and our suppliers by clarifying what RAND means.

Please share this letter with the members of the Standards Board.



Sincerely,



Jerry C. Huang
VP of Legal Affairs
VIZIO, Inc.