

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

COMCAST CABLE COMMUNICATIONS, LLC,
Petitioner,

v.

ENTROPIC COMMUNICATIONS, LLC,
Patent Owner.

Case IPR2024-00435
Patent 11,381,866

EXHIBIT 1081
PETITIONER'S COUNTER DESIGNATIONS

Pursuant to the Board's email of August 6, 2025, authorizing Petitioner to submit counter designations, Petitioner Comcast Cable Communications, LLC hereby submits the below counter designations from the deposition transcript of Petitioner's expert, Mr. Lett, dated July 23, 2025, in IPR2025-00180 (Ex. 2023). Petitioner's counter designations are indicated generally by the following page and line numbers and more specifically by the highlighted portions of this testimony below.

Designation	Text
20:9-21:8	9 Q. What does UHF band mean? 10 A. UHF band, he says 300 megahertz to 3 11 gigahertz. 12 Q. Okay. So it's just a nomenclature, that the 13 range of 300 to 600 megahertz -- 3 gigahertz, I'm 14 sorry, is called a UHF band? 15 A. That's what Zhang is disclosing, yes. 16 Q. Based on your expertise, is that an accurate 17 description? 18 A. I have no reason to dispute what he's 19 saying. 20 Q. And based on your expertise, is it accurate 21 that channels in the UHF band are spaced at 22 6 megahertz intervals? 23 A. In the United States, North America, 24 channels were generally spaced at 6 megahertz. 25 However, there is gaps in that band. Right? Page 21 1 So, you know, I forget whether it's between 2 Channel 4 and 5 or between Channel 5 and 6, there is a 3 gap where, you know, there is other services that are

Designation	Text
	4 in those frequencies. Like an aeronautical band, for 5 example, as well as other areas. 6 So they were generally spaced 6 megahertz, 7 and then there were gaps in the bands where, you know, 8 other services may be in there.
30:8-31:18	8 Q. Let me ask differently. 9 Is the entire frequency band between 54 to 10 264 used by that cable or television broadcast system 11 one way or another? 12 A. Well, so it depends. Right? So cable 13 systems were flexible. They could do whatever they 14 wanted to because it's a closed system. Maybe that's 15 not the way to describe it. But they -- they were 16 allowed to transmit anything including in that band 17 88 -- excuse me -- yeah, 88 to 174 megahertz. They 18 were allowed to transmit in those bands. 19 Sometimes -- and probably, this reference 20 explains it, but Walscor [Phonetic] and Jim Farmer 21 would know very well that you generally didn't do 22 that, or -- any more than you -- you were very careful 23 on doing that because you want to make sure you don't 24 interfere with other services. Like aeronautical, for 25 example. And probably military. But I can't remember 1 what else is in there. I would have to look it up -- 2 a frequency allocation chart to see exactly. 3 But my point is that, I'm allowed to, as a 4 cable operator, transmit things in those bands; and I 5 do. Not me personally, but a cable multisystem 6 operator would transmit some things. But they were 7 very careful. And the reason they were very careful 8 was if there was any leakage or interference caused by

Designation	Text
	9 our signal to those other bands. 10 And so it's very difficult to go through the 11 cable network and find, like, where the leakage is 12 coming from. Like it may be a frayed coaxial cable or 13 something like that that's causing it to transmit 14 something that's interfering with, let's say, an 15 aeronautical band. It's very difficult to find those. 16 So we kind of avoided -- or let's say we were very 17 careful. The cable MSOs were very careful about what 18 to transmit in those frequencies.
36:1-16	1 Q. So do I understand you correctly that 2 desired channels are basically the channels the user 3 is interested in watching and is authorized to watch? 4 A. So the 275 patent, I don't think, defines 5 desired channels, but it gives an example of what I 6 understand he means by desired channels. So, like, 7 Figure 2 of the 275 patent shows a diagram with ten 8 channels. And four of them have hash markings, and 9 he's calling those desired channels. 10 And, similarly, Zhang talks about channels 11 that are used by a subscriber, selected or used by a 12 subscriber. And I generally understand that to mean 13 the same thing, that it's the ones that we might be 14 interested in downconverting the baseband or selecting 15 out of the full spectrum of channels that are selected 16 or used by a subscriber.

Designation	Text
44:2-17	2 Q. Are there any channels -- in Zhang Figure 6, 3 are there any Channel -- strike that. 4 In Zhang Figure 6, are there any channels in 5 the input signal of 540 to 750 that are not 6 demultiplexed by the demultiplexer Channels 1 through 7 35? 8 A. No. He doesn't show in Figure 6 9 demultiplexing less channels than on the RF input. 10 But he clearly discloses that in a number of places in 11 the patent. In the -- Zhang's patent. 12 Q. So I'm asking about Figure 6. 13 So in Zhang Figure 6, demultiplexer that 14 demultiplexes Channels C1 through C35 has 15 demultiplexed all the channels -- all the RF channels 16 in the input signal; correct? 17 A. In this specific example, yes.
49:3-13	3 Q. If a user does not watch a specific channel, 4 that channel would not be demodulated; correct? 5 A. Well, Zhang discloses that the selection of 6 which ones to select can be made by the subscriber. I 7 think he also says by the service provider. 8 Like, for example, if I had -- if I was not 9 subscribed to HBO, right, I would probably -- whether 10 you call it selecting or not, I would never really 11 select HBO in that specific example. And with one of 12 the C-chains. We wouldn't waste one of the C-chains 13 on something that we're not authorized to watch.

Designation	Text
59:18 – 61:2	18 Q. Right. 19 So C is -- I'm not disputing with you that 20 Channels C are selected from the full spectrum input. 21 Let me ask this question. 22 Do you agree that Channels D, as in David, 1 23 through 20 is a subset of Channels C1 through C35? 24 A. Well, Zhang discloses that m, which is the 25 D -- the number of D-elements, can be less than or Page 60 1 equal to n, which is the number of C-elements. 2 So they can be equal, or they can be less. 3 Q. Thank you. 4 A. He discloses both. 5 Q. Thank you. 6 So I don't dispute with you that Channels C 7 are selected from the input frequency. 8 My question is whether Channels D are 9 selected from the input frequency, or are they 10 selected from Channels C? 11 A. So this functionality is -- so if you said 12 let's make D -- let's make C equals to D. Right? 13 We're selecting -- it's the exact same thing. C1 is 14 the exact same thing as D1. C2 is the exact same as 15 D2. And so on and so forth. 16 All of those are selected from the input 17 frequencies. In other words, Zhang's digital selector 18 can be configured as -- to just pass through all the 19 Cs. 20 Q. Got it. 21 So you're talking about the situation where 22 n equals m, where all Channels C are selected as 23 Channels D to be sent to demodulators; correct?

Designation	Text
	24 A. That was one example. They could also 25 output all of the Cs with this fast channel change Page 61 1 capability, which is the reason for the digital 2 selector as disclosed by Zhang.
61:9-19	9 Q. In Zhang's Figure 6, are Channels D1 through 10 20 selected from Channels C1 through C35, or are they 11 selected from the input frequency spectrum through the 12 demultiplexer 630? 13 MR. KRONENTHAL: Objection. Form. 14 THE WITNESS: So perhaps it's easier if we 15 just put a box around 630 and 640, and say, like, 16 that's one box. Perhaps -- I think you're getting 17 confused by this enhanced feature capability of Zhang. 18 D1 through D20 are selected from the input 19 spectrum.

Dated: August 19, 2025

By: /Frederic M. Meeker/

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