

# PROTECTIVE ORDER MATERIAL

## Message

---

**From:** LKMChong@aol.com [LKMChong@aol.com]  
**Sent:** 6/9/2004 8:55:53 PM  
**To:** mdiaz@bbitv.com  
**Subject:** Re: Provisional Patent Application Draft

Hi Milton --

Yes, I was using "VoD" for the generic meaning of any video requested on demand. However, if your (and the industry's) understanding of that term is more specific, i.e., continuous video program replay, then the term should be changed in the patent specification to one that is more generic, e.g., "on-demand" video.

On the other hand, you seem to favor the term "iTV" or "interactive TV" as a broad term for any system that allows user interaction with TV programming. For me "iTV" has a more specific meaning of webpage-like interaction with buttons and icons on the display. However, my bias has to do with other cases I've drafted and not with any familiarity of how the term is used in the industry currently. So if you prefer this term, then we should use it. In a patent application, the inventor is really the one who defines the meaning and scope of the terms used in it. So we should use the terms you are comfortable with, not mine.

Leighton

P.S. Thanks for the update on your schedule. Hope your VC meetings prove fruitful. My family returns from their trip on June 19, but I'm sure I can get free for some fun nights out when you get here Tuesday 6/22 or Wednesday 6/23.

BBiTV EX2105  
DISH v. BBiTV