

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION

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U.S. DISTRICT COURT  
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TX EASTERN-MARSHALL

BY \_\_\_\_\_

COMPRESSION LABS, INC.,

Plaintiff,

-against-

1. DELL INC.,
2. INTERNATIONAL BUSINESS  
MACHINES CORPORATION,
3. TOSHIBA AMERICA, INC.,

Defendants.

Civil Action  
No. 2:04-CV-159-TJW  
(Judge Ward)

**DEFENDANTS' JOINT MOTION TO TRANSFER TO JUDGE FOLSOM**

Defendants Dell Inc. ("Dell"), International Business Machines Corporation ("IBM"), and Toshiba America, Inc. ("Toshiba") (collectively "Defendants") respectfully submit this motion to transfer this case to Judge David Folsom in the interests of justice and judicial economy.

**Preliminary Statement**

This patent infringement action should be transferred to Judge Folsom because it is virtually identical to a previously filed action, currently pending before Judge Folsom, in which Plaintiff Compression Labs, Inc. ("CLI") alleges infringement of the same patent by the very same technology at issue in this action. Indeed, the complaints in both actions are identical in all material respects. Thus, the interests of justice, including the elimination of duplicative litigation and the preservation of judicial

resources, militate strongly in favor of the resolution of these closely related patent cases with substantially overlapping issues in the same court and before the same judge.

### **Statement of Facts**

On April 22, 2004, CLI filed two separate actions in the Marshall Division of this Court alleging infringement of U.S. Patent No. 4,698,672 (the “’672 patent”). In the first-filed action, Compression Labs, Inc. v. Adobe Systems Inc. et al., Civil Action No. 2:04-CV-158, CLI sued twenty-eight defendants and was represented by The Roth Law Firm and Jenkins & Gilchrist (the “Adobe Action”).<sup>1</sup> CLI brought a second action, Compression Labs, Inc. v. Dell Inc. et al., Civil Action No. 2:04-CV-159, against Dell, IBM and Toshiba, represented only by Jenkins & Gilchrist (the “Dell Action”). Both actions were assigned to Your Honor. On May 25, 2004, this Court entered an order of recusal in the Adobe Action, which was subsequently reassigned to Judge Folsom.

CLI’s allegations in both the Adobe and Dell Actions are identical, as demonstrated by the following word-for-word identical excerpt from the Complaints:

Defendants offer to sell, sell, use and/or import into the United States devices, at least portions of which are designed to be at least partly compliant with the JPEG standard as defined by CCITT Recommendation T.81 approved on September 18, 1992, entitled “Information Technology - - Digital Compression and Coding of Continuous Tone Still Images-- Requirements and Guidelines,” the identical text of which is also published as ISO/IEC International Standard 10918-1, or with any version or variance thereof defining a lossy compression scheme (hereinafter referred to as “the Accused Devices”). The Accused Devices are covered

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<sup>1</sup> The Complaint in the Adobe Action, attached as Exhibit A to the Declaration of Eric M. Albritton, is time-stamped 3:13 p.m. on April 22, 2004. The Complaint in the Dell Action, attached as Exhibit B to the Declaration of Eric M. Albritton, is time-stamped 3:37 p.m., also on April 22, 2004. On June 21, 2004, in the Adobe Action, a First Amended Complaint was filed removing Adobe as a defendant. Otherwise, the First Amended Complaint, attached as Exhibit C to the Declaration of Eric M. Albritton, is substantively identical to the original Adobe Complaint.

by, and carry out methods that are covered by, one or more claims of the '672 patent.

Through their actions including offering to sell, selling, using and importing the Accused Devices, Defendants have infringed the aforementioned patent and actively induced others to infringe and contributed to the infringement by others of the '672 patent in the United States, including within the jurisdiction of this Court. Certain of the Defendants have also made the Accused Devices in the United States, and such Defendants have also infringed the aforementioned patent by their actions in this regard.

(Compare Exh. A ¶¶ 35-36 with Exh. B ¶¶ 10-11.)<sup>2</sup> CLI seeks identical remedies in both actions. (Compare Exh. A ¶¶ A-E with Exh. B ¶¶ A-E.)

The relatedness of these actions is confirmed by the fact that, on the Civil Action Cover Sheet for the Dell Action, CLI identified the Adobe Action as a collateral proceeding pursuant to Local Rule CV-42(a), indicating that the Dell Action "involves subject matter that either comprises all or a material part of the subject matter or operative facts of" the Adobe Action. (See Dell Action Cover Sheet (Exh. D).)

### Argument

Transfer of this action to Judge Folsom, before whom the substantively identical Adobe Action is currently pending, would serve the interests of justice and judicial economy. While the defendants in the Dell and Adobe Actions are different, CLI has alleged infringement of the same patent by the same allegedly infringing activity in both actions. The same patent claims will need to be construed. There will be substantial overlap of issues raised by defendants' invalidity, unenforceability and other defenses. Indeed, since CLI alleges that an industry standard for digital picture transmission (the JPEG standard) infringes the '672 patent, defendants' non-infringement defenses will

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<sup>2</sup> "Exh. \_\_\_" refers to exhibits to the Declaration of Eric M. Albritton filed herewith.

also be substantially similar, if not identical. (Compare Exh. A ¶ 35 with Exh. B ¶ 10.)

In fact, several of the accused products in this action are identical to the accused products in the Adobe Action.<sup>3</sup> Under these circumstances, both cases should proceed before a single judge.

“District Judges have the inherent power to transfer cases from one to another for the expeditious administration of justice.” United States v. Stone, 411 F.2d 597, 599 (5th Cir. 1969); see also, e.g., Baumgart v. Fairchild Aircraft Corp., 981 F.2d 824, 828 (5th Cir. 1993); 28 U.S.C. § 1404; Fed. R. Civ. P. 42(a); Local Rule CV-42.

“[A] number of courts, including the Fifth Circuit, have held that the existence of related litigation in a transferee court is a factor that weighs strongly in favor of transfer.” Datatreasury Corp. v. First Data Corp., 243 F. Supp. 2d 591, 594 (N.D. Tex. 2003). In Save Power Ltd. v. Syntek Fin. Corp., for example, the Fifth Circuit held that a motion to transfer to another judge within the same division should be granted where there was a “substantial overlap of issues” with a previously filed related action pending before the transferee judge. 121 F.3d 947, 950-52 (5th Cir. 1997) (“The concern manifestly is to avoid the waste of duplication, to avoid rulings which may trench upon the authority of sister courts, and to avoid piecemeal resolution of issues that call for a uniform result.”) (citation omitted). The Court held that “[c]omplete identity of parties is not required for dismissal or transfer of a case filed subsequently to a substantially related action,” but that “[t]he crucial inquiry is one of ‘substantial overlap’” of issues. Id. at 950-51. The reasoning of the Fifth Circuit in Save Power strongly suggests that transfer of this case to Judge Folsom is appropriate.

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<sup>3</sup> For example, both Dell and Canon, a defendant in the Adobe Action, sell accused Canon cameras. (See, e.g., Exh. E.)

As the Datatreasury court explained, the public's interest in avoiding duplication, inconsistent rulings and the piecemeal resolution of issues that call for a uniform result is particularly compelling where there are infringement actions involving the same patent, such as the Adobe and Dell Actions, pending before different judges in different courts:

Having two different courts interpret the same patent claims would risk inconsistent claim construction rulings which, in turn, would promote uncertainty and impede the administration of justice. This untenable prospect favours resolving related patent cases in the same forum whenever possible.

Datatreasury, 243 F. Supp. 2d at 596 (emphasis added); see also id. at 594 (“Piecemeal litigation in the complex and technical area of patent and trademark law is especially undesirable.”). In Datatreasury, the court found that “judicial economy dictate[d]” the transfer of a patent infringement action from Dallas to Texarkana because actions involving the same patent, but different parties and different accused devices, were pending in Texarkana. Id. at 596-97. Here, the interests of justice and judicial economy are no less compelling because the Dell and Adobe Actions are pending in the same division.

In addition, transfer to Judge Folsom will allow for the coordination or consolidation of the Adobe and Dell Actions, which would promote judicial efficiency and save the parties and witnesses time and money.<sup>4</sup> Pre-trial discovery, for example, could be conducted in a more efficient manner. In addition, witnesses could be saved the time and expense of appearing for duplicative depositions and the judicial resources

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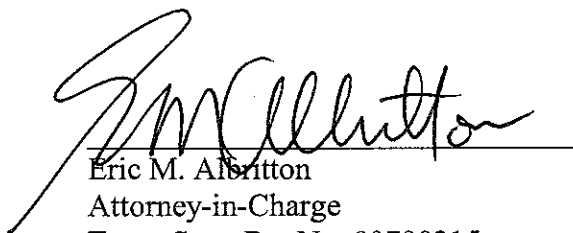
<sup>4</sup> See, e.g., Manual for Complex Litigation (Fourth) § 20.11 (2004) (“All related civil cases pending in the same court should initially be assigned to a single judge to determine whether consolidation, or at least coordination of pretrial proceedings, is feasible and is likely to reduce conflicts and duplication.”).

necessary to address the complex technology, facts and legal arguments at issue could be halved. Therefore, because transfer will not result in delay or prejudice to either side,<sup>5</sup> transfer of this action to Judge Folsom is warranted.

**Conclusion**

In the interests of justice and judicial economy, this action should be transferred to Judge Folsom.

June 29, 2004



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<sup>5</sup> Both the Dell and Adobe Actions are at the same stage. Responsive pleadings are due on July 6, 2004 in both actions.

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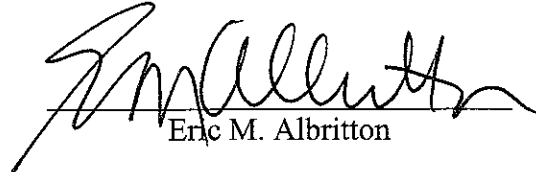
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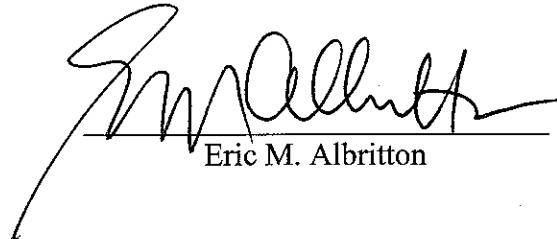
**CERTIFICATE OF SERVICE**

A true and correct copy of the foregoing was sent, via certified mail, return receipt requested, to all counsel of record on this the 29th day of June, 2004.

  
Eric M. Albritton

**CERTIFICATE OF CONFERENCE**

The undersigned conferred with Wesley Hill, counsel for the plaintiff, who advised that the plaintiff is opposed to this motion.

  
Eric M. Albritton



**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION**

COMPRESSION LABS, INC.,

Plaintiff,

-against-

1. DELL INC.,
2. INTERNATIONAL BUSINESS  
MACHINES CORPORATION,
3. TOSHIBA AMERICA, INC.,

Defendants.

Civil Action  
No. 2:04-CV-159-TJW  
(Judge Ward)

**DECLARATION OF ERIC M. ALBRITTON IN SUPPORT OF DEFENDANTS'  
JOINT MOTION TO TRANSFER TO JUDGE FOLSOM**

I declare that my name is ERIC M. ALBRITTON, I am over the age of eighteen and I am fully competent to make this declaration:

1. I am a member of the Albritton Law Firm, counsel for Defendant International Business Machines Corporation in this action. I am admitted to practice before the courts in the State of Texas and in the United States District Court for the Eastern District of Texas. I make this declaration in support of Defendants' Joint Motion to Transfer to Judge Folsom.

2. Attached hereto as Exhibit A is a true and correct copy of the Complaint filed in Compression Labs, Inc. v. Adobe Systems Inc. et. al., Civil Action No. 2:04-CV-158.

3. Attached hereto as Exhibit B is a true and correct copy of the Complaint filed in Compression Labs, Inc. v. Dell Inc. et. al., Civil Action No. 2:04-CV-159.

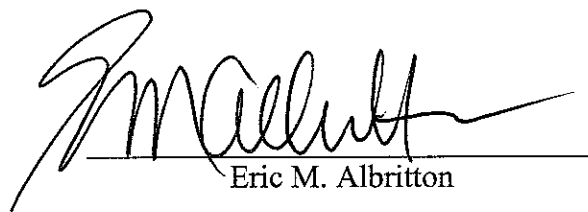
4. Attached hereto as Exhibit C is a true and correct copy of the First Amended Complaint filed in Compression Labs, Inc. v. Adobe Systems Inc. et. al., Civil Action No. 2:04-CV-158, now Compression Labs, Inc. v. Agfa Corp. et al.

5. Attached hereto as Exhibit D is a true and correct copy of the Civil Action Cover Sheet filed in Compression Labs, Inc. v. Dell Inc. et. al., Civil Action No. 2:04-CV-159.

6. Attached hereto as Exhibit E is a true and correct copy of an excerpt from the website of Dell, Inc.

I declare under penalty of perjury that the foregoing is true and correct.

Executed at Longview, Texas this 29th day of June, 2004.

  
Eric M. Albritton

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION

EMERSON-CLERK  
DISTRICT COURT  
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Compression Labs, Incorporated. )

Plaintiff, )

v. )

1. Adobe Systems Incorporated. )

2. Agfa Corporation, )

3. Apple Computer, Incorporated, )

4. Axis Communications, Incorporated, )

5. Canon, USA, Incorporated, )

6. Concord Camera Corporation, )

7. Creative Labs, Incorporated, )

8. Eastman Kodak Company, )

9. Fuji Photo Film U.S.A., )

10. Fujitsu Computer Products of America, )

11. Gateway, Incorporated, )

12. Hewlett-Packard Company, )

13. JASC Software, )

14. JVC Americas Corporation, )

15. Kyocera Wireless Corporation, )

16. Macromedia, Incorporated, )

17. Matsushita Electric Corporation of )  
America, )

18. Mitsubishi Digital Electronics America, )  
Incorporated, )

19. Océ North America, Incorporated, )

20. Onkyo U.S.A. Corporation, )

21. PalmOne, Incorporated, )

22. Panasonic Communications Corporation )  
of America, )

23. Panasonic Mobile Communications )  
Development Corporation of USA, )

24. Ricoh Corporation, )

25. Riverdeep, Incorporated (d.b.a. )  
Broderbund), )

26. Savin Corporation, )

27. Thomson S.A., )

28. Xerox Corporation, )  
Defendants. )

BY \_\_\_\_\_

C.A. No. 2-04 CV-158

JURY

COMPLAINT

Compression Labs, Inc. ("CLI") for its Complaint against Defendants alleges as follows:

### **NATURE OF THE ACTION**

1. This is a patent infringement action to stop each Defendant's unauthorized and infringing sale, offers to sell, use and importation of products incorporating CLI's patented technology. CLI seeks injunctive relief to stop Defendants from continuing to infringe CLI's valuable patent rights, as well as monetary damages.

### **THE PARTIES**

2. Plaintiff, CLI, is a corporation existing and organized under the laws of Delaware and has its principal place of business at 108 Wild Basin Drive, Austin, TX 78746.

3. Defendant Adobe Systems Incorporated is a corporation existing and organized under the laws of Delaware and has its principal place of business at 345 Park Avenue, San Jose, CA 95110.

4. Defendant Agfa Corporation is a corporation existing and organized under the laws of Delaware and has its principal place of business at 100 Challenger Road, Ridgefield Park, NJ 07660.

5. Defendant Apple Computer, Incorporated is a corporation existing and organized under the laws of California and has its principal place of business at 1 Infinite Loop, Cupertino, CA 95014.

6. Defendant Axis Communications, Incorporated is a corporation existing and organized under the laws of Massachusetts and has its principal place of business at 100 Apollo Drive, Chelmsford, MA 01824.

7. Defendant Canon, U.S.A., Incorporated is a corporation existing and organized under the laws of New York and has its principal place of business at One Canon Plaza, Lake Success, New York, NY 11042.

8. Defendant Concord Camera Corporation is a corporation existing and organized under the laws of New Jersey and has its principal place of business at 4000 Hollywood Boulevard, Suite 650N, Hollywood, FL 33021.

9. Defendant Creative Labs, Incorporated is a corporation existing and organized under the laws of California and has its principal place of business at 1901 McCarthy Boulevard, Milpitas, CA 95035.

10. Defendant Eastman Kodak Company is a corporation existing and organized under the laws of New Jersey and has its principal place of business at 343 State Street, Rochester, NY 14650.

11. Defendant Fuji Photo Film U.S.A. is a corporation existing and organized under the laws of New York and has a place of business at 200 Summit Lake Drive, Valhalla, NY 10595.

12. Defendant Fujitsu Computer Products of America is a corporation existing and organized under the laws of California and has its principal place of business at 2904 Orchard Parkway, San Jose, CA 95134.

13. Defendant Gateway, Incorporated is a corporation existing and organized under the laws of Delaware and has its principal place of business at 14303 Gateway Place, Poway, CA 92064.

14. Defendant Hewlett-Packard Company is a corporation existing and organized under the laws of Delaware and has its principal place of business at 3000 Hanover Street, Palo Alto, CA 94304.

15. Defendant JASC Software is a corporation existing and organized under the laws of Minnesota and has its principal place of business at 7905 Fuller Road, Eden Prairie, MN 55344.

16. Defendant JVC Americas Corporation is a corporation existing and organized under the laws of Delaware and has its principal place of business at 1700 Valley Road, Suite 1, Wayne, NJ 07470.

17. Defendant Kyocera Wireless Corporation is a corporation existing and organized under the laws of Delaware and has its principal place of business at 10300 Campus Point Drive, San Diego, CA 92121.

18. Defendant Macromedia, Incorporated is a corporation existing and organized under the laws of Delaware and has its principal place of business at 600 Townsend Street, San Francisco, CA 94103.

19. Defendant Matsushita Electric Corporation of America is a corporation existing and organized under the laws of Delaware and has its principal place of business at 1 Panasonic Way, Secaucus, NJ 07094.

20. Defendant Mitsubishi Digital Electronics America, Incorporated is a corporation existing and organized under the laws of Delaware and has its principal place of business at 9351 Jeronimo Road, Irvine, CA 92618.

21. Defendant Océ North America, Incorporated is a corporation existing and organized under the laws of Delaware and has its principal place of business at 5450 North Cumberland Avenue, Chicago, IL 60656.

22. Defendant Onkyo U.S.A. Corporation is a corporation existing and organized under the laws of New Jersey and has its principal place of business at 18 Parkway, Upper Saddle River, NJ 07458.

23. Defendant PalmOne, Incorporated is a corporation existing and organized under the laws of Delaware and has its principal place of business at 400 North McCarthy Boulevard, Milpitas, CA 95035.

24. Defendant Panasonic Communications Corporation of America is a corporation existing and organized under the laws of Delaware and has its principal place of business at 7625 Panasonic Way, San Diego, CA 92154.

25. Defendant Panasonic Mobile Communications Development Corporation of USA is a corporation existing and organized under the laws of Delaware and has its principal place of business at 1225 Northbrook Parkway, Suite 2-352, Suwanee, GA 30024.

26. Defendant Ricoh Corporation is a corporation existing and organized under the laws of Delaware and has its principal place of business at 5 Dedrick Place, West Caldwell, NJ 07006.

27. Defendant Riverdeep, Incorporated (d.b.a. Broderbund) is a corporation existing and organized under the laws of Delaware and has its principal place of business at 500 Redwood Boulevard, Novato, CA 94947.

28. Defendant Savin Corporation is a corporation existing and organized under the laws of Delaware and has its principal place of business at 333 Ludlow Street, Stamford, CT 06902.

29. Defendant Thomson S.A. is a corporation existing and organized under the laws of Delaware and has its principal place of business at 10330 North Meridian Street, Indianapolis, IN 46290.

30. Defendant Xerox Corporation is a corporation existing and organized under the laws of New York and has its principal place of business at 800 Long Ridge Road, Stamford, CT 06904.

#### **JURISDICTION AND VENUE**

31. This action for patent infringement arises under the Patent Laws of the United States, 35 U.S.C. §§ 1 et seq., and in particular 35 U.S.C. §§ 271, 281, 283, 284 and 285. This Court has jurisdiction over the subject matter of this action under 28 U.S.C. 1338(a).

32. This Court has personal jurisdiction over each of the Defendants and venue is proper in this Court pursuant to 28 U.S.C. §§ 1391 and 1400.

#### **COUNT 1 - PATENT INFRINGEMENT**

33. This case involves technology used to process digital signals. CLI owns patents relating to such technology, and CLI invested substantial amounts in related research and development.

34. United States Patent No. 4,698,672 entitled "Coding System for Reducing Redundancy" (hereinafter "the '672 patent"), was duly and legally issued on October 6, 1987. CLI is an owner of the '672 patent and, pursuant to an agreement with its co-owner, has the exclusive rights to sue and recover for infringement thereof with respect to the Accused Devices, as hereinafter defined. A copy of the '672 patent is attached as Exhibit A.

35. Defendants offer to sell, sell, use, and/or import into the United States devices, at least portions of which are designed to be at least partly compliant with the JPEG standard as defined by CCITT Recommendation T.81 approved on September 18, 1992, entitled "Information Technology—Digital Compression and Coding of Continuous Tone Still Images—Requirements and Guidelines," the identical text of which is also published as ISO/IEC International Standard 10918-1, or with any version or variance thereof defining a lossy compression scheme (hereinafter referred to as "the Accused Devices"). The Accused Devices are covered by, and carry out methods that are covered by, one or more claims of the '672 patent.

36. Through their actions including offering to sell, selling, using and importing the Accused Devices, Defendants have infringed the aforementioned patent and actively induced others to infringe and contributed to the infringement by others of the '672 patent in the United States, including within the jurisdiction of this Court. Certain of the Defendants also have made the Accused Devices in the United States, and such Defendants have also infringed the aforementioned patent by their actions in this regard.

37. CLI is likely to be irreparably harmed by Defendants' infringement, inducement of others to infringe, and contributory infringement of the '672 patent. CLI has no adequate remedy at law.

WHEREFORE, CLI prays for judgment that:

A. United States Patent No. 4,698,672 has been infringed, directly, by inducement, and/or contributorily, by each Defendant;

B. Each Defendant, its officers, agents, servants and employees, and those persons in active concert and participation with any of them, be permanently enjoined from the direct or contributory infringement of, and from inducing others to infringe, United States Patent No. 4,698,672;

C. CLI be awarded damages sufficient to compensate it for each Defendant's infringement, contributory infringement and inducement of others to infringe, that such damages



be increased to three times the amount found or assessed pursuant to 35 U.S.C. § 284, and that such damages be awarded to CLI with prejudgment interest;

D. That this case be declared exceptional pursuant to 35 U.S.C. § 284 and that CLI be awarded its attorney fees, costs and expenses in this action; and

E. CLI be awarded such other and further relief as the Court may deem just.

CLI DEMANDS A TRIAL BY JURY.

Respectfully submitted,  
Compression Labs, Inc.

Dated: April 22, 2004

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# Exhibit A

**United States Patent** [19]

Chen et al.

[11] Patent Number: **4,698,672**

[45] Date of Patent: **Oct. 6, 1987**

- [54] **CODING SYSTEM FOR REDUCING REDUNDANCY**
- [75] Inventors: Wen-hsiung Chen, Sunnyvale; Daniel J. Klenke, Milpitas, both of Calif.
- [73] Assignee: Compression Labs, Inc., San Jose, Calif.
- [21] Appl. No.: 923,630
- [22] Filed: Oct. 27, 1986
- [51] Int. Cl.<sup>4</sup> ..... H04N 7/133; H04N 7/137
- [52] U.S. Cl. .... 358/136; 358/261; 358/262; 375/27
- [58] Field of Search ..... 358/136, 135, 133, 261, 358/262; 375/27, 31, 33

Primary Examiner—Howard W. Britton  
 Attorney, Agent, or Firm—Flesler, Dubb, Meyer & Lovejoy

[57] **ABSTRACT**

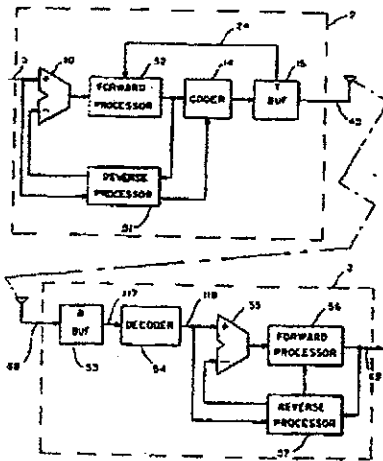
The present invention relates to methods and apparatus for processing signals to remove redundant information thereby making the signals more suitable for transfer through a limited-bandwidth medium. The present invention specifically relates to methods and apparatus useful in video compression systems. Typically, the system determines differences between the current input signals and the previous input signals using mean-square difference signals. These mean-square signals are processed and compared with one or more thresholds for determining one of several modes of operation. After processing in some mode, the processed signals are in the form of digital numbers and these digital numbers are coded, using ordered redundancy coding, and transmitted to a receiver.

[56] **References Cited**

**U.S. PATENT DOCUMENTS**

4,302,775	11/1981	Widergren	358/136
4,476,495	10/1984	Fujisawa	358/262
4,520,490	5/1985	Wei	375/27
4,558,370	12/1985	Mitchell	358/262
4,633,325	12/1986	Usubuchi	358/133

46 Claims, 4 Drawing Figures



U.S. Patent Oct. 6, 1987

Sheet 1 of 3

4,698,672

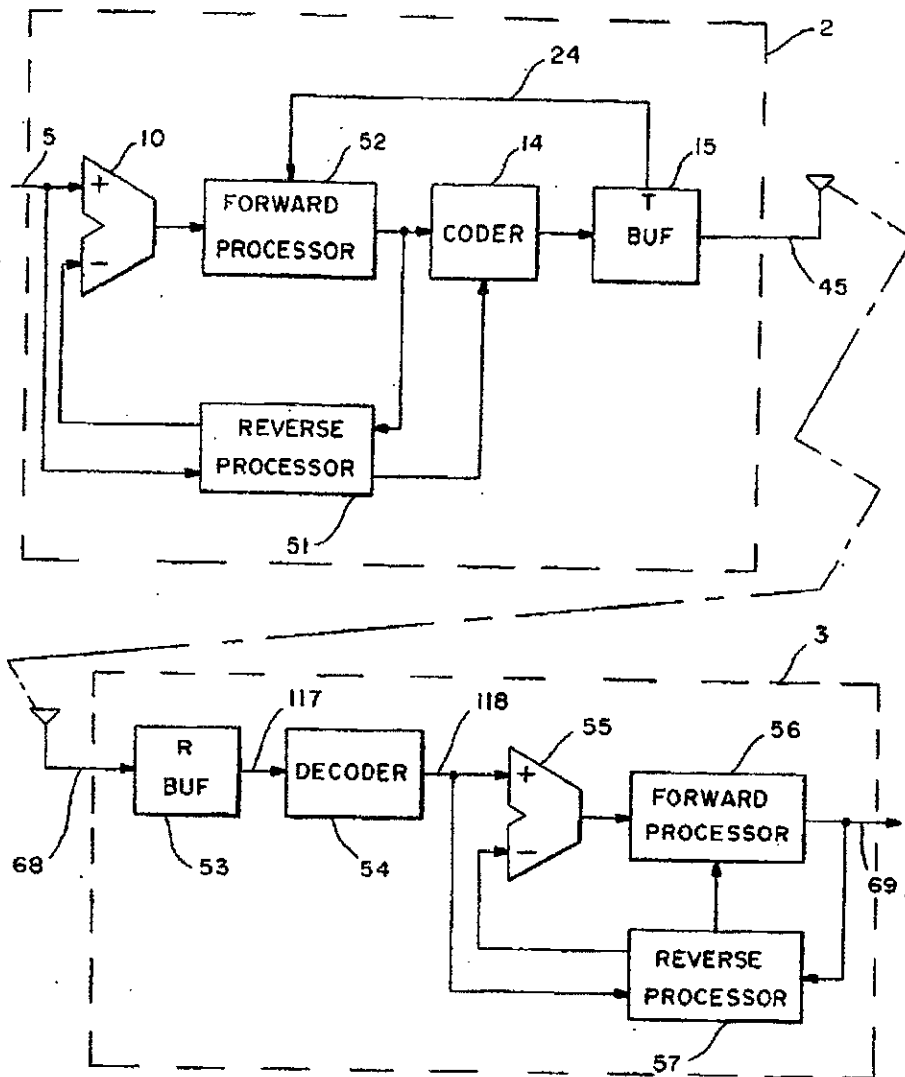


FIG. — 1

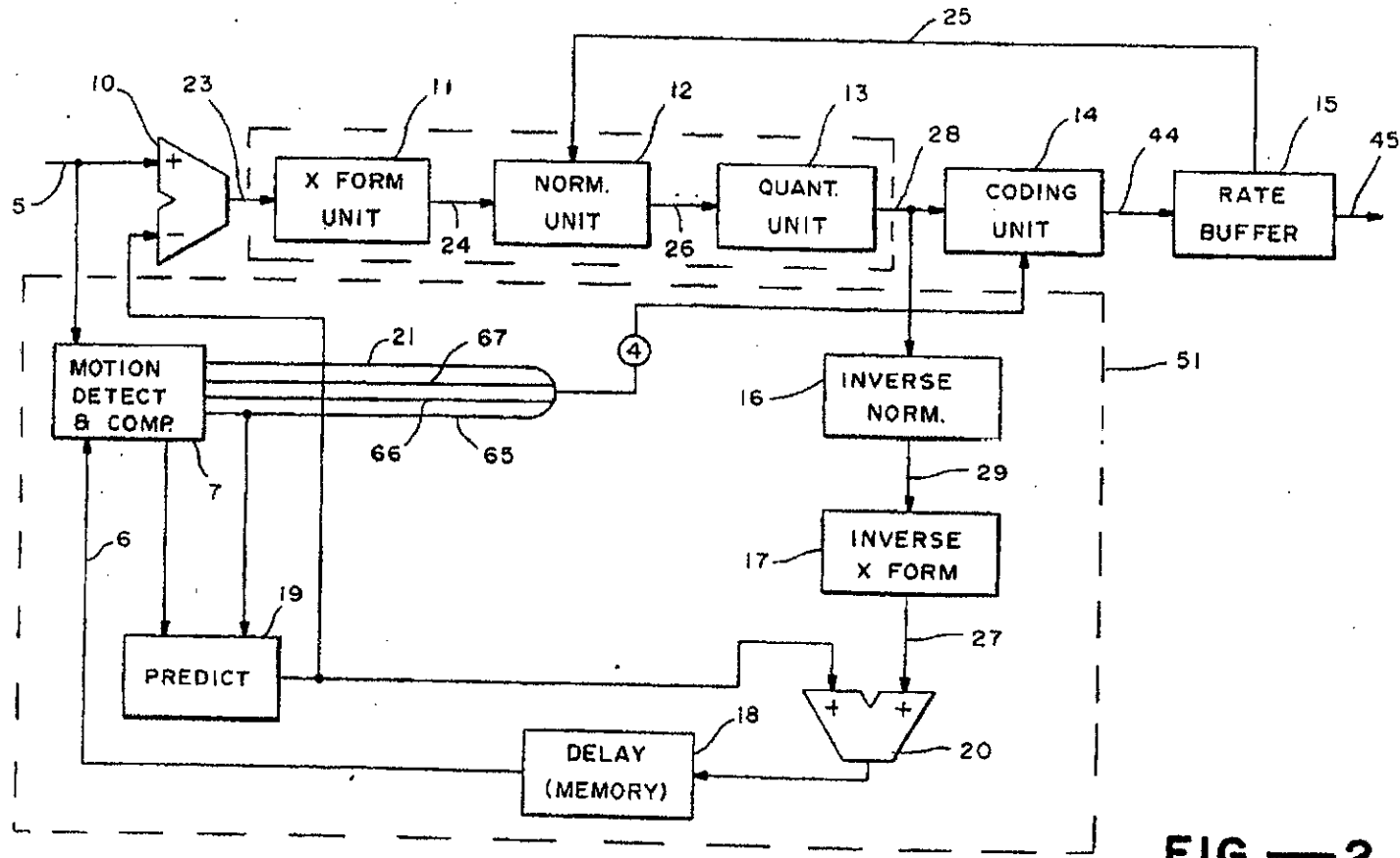


FIG.—2

U.S. Patent Oct. 6, 1987 Sheet 3 of 3 4,698,672

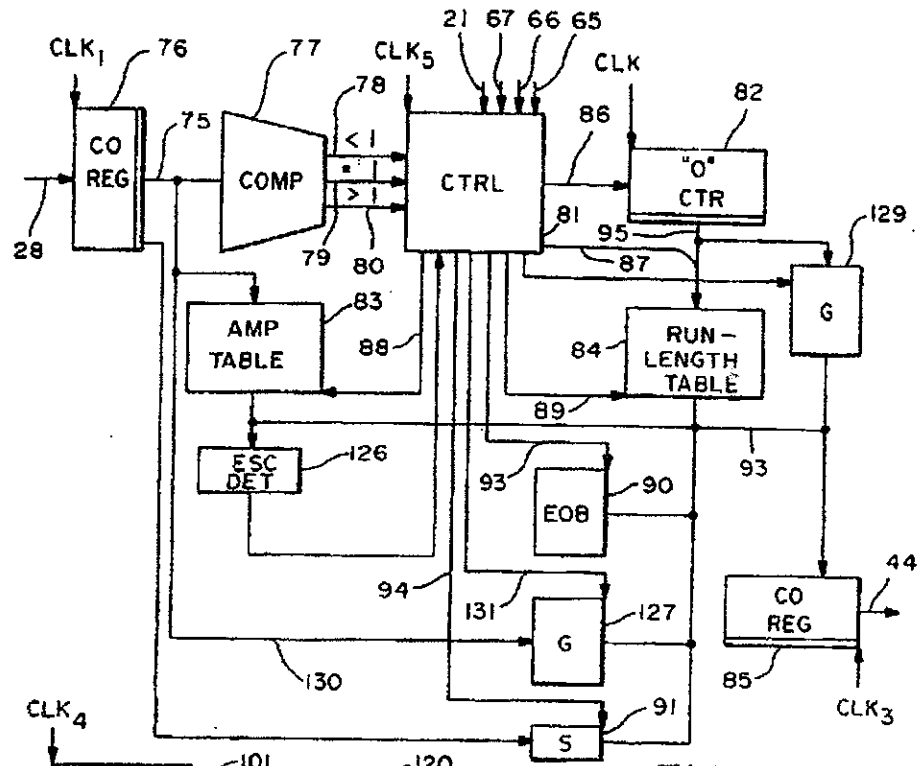


FIG.—3

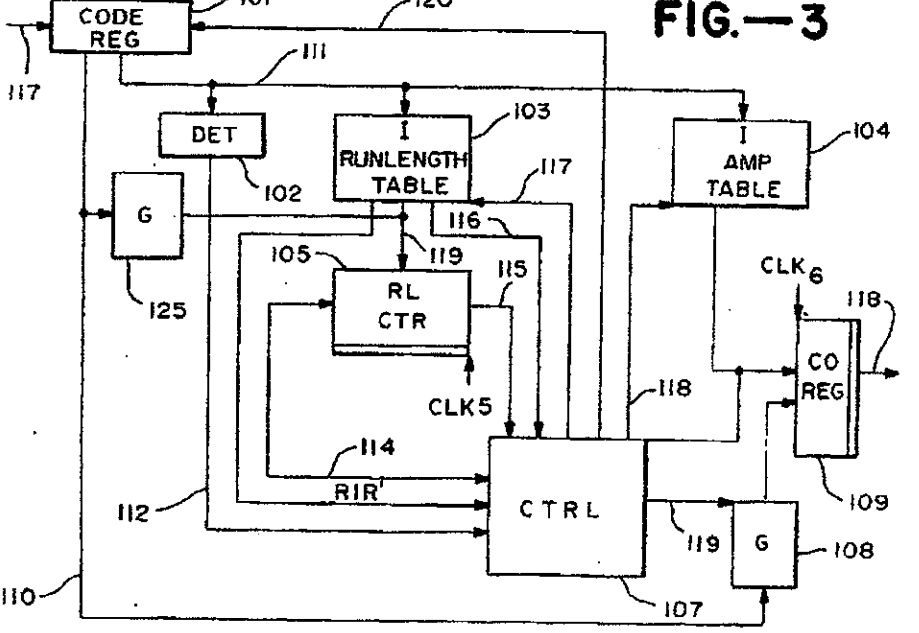


FIG.—4

4,698,672

1

## CODING SYSTEM FOR REDUCING REDUNDANCY

### CROSS-REFERENCE TO RELATED APPLICATION

Title: A COMBINED INTRAFRAME AND INTER-FRAME TRANSFORM CODING SYSTEM  
 Ser. No.: 479,766 Filed: 83/03/28 (now abandoned)  
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### BACKGROUND OF THE INVENTION

The present invention relates to methods and apparatus for processing signals to remove redundant information thereby making the signals more suitable for transfer through a limited-bandwidth medium. The present invention specifically relates to methods and apparatus useful in video compression systems.

Many signal processing techniques useful in video compression systems are known. For example, digital encoding is often employed in processing television signals which are to be transferred over transmission channels since digital data streams are more immune to noise degradation.

In order to digitally encode a television signal, a significant number of bits, 4 or more, may be required to provide for an acceptable range of gray scale for each of the hundreds of thousands of separate picture elements (pixels) which form an image. Consequently, data rates for unprocessed digitalized television signals typically require a bandwidth greater than 40 megabits per second. If the communications link is an earth satellite, an unprocessed video signal typically occupies nearly the entire bandwidth of the satellite, with very few channels, if any, left over for other uses. A T1 communication channel is typical and has only a 1.5 megabit per second bandwidth. A practical yet effective way to reduce the bandwidth of digitalized television signals is needed so that fewer channels are required for transmission over a communications path and so that the quality of transmitted signals is maintained even when reduced bandwidth transmission is employed.

U.S. Pat. No. 4,302,775, assigned to the same assignee as the present invention, describes a scene adaptive coding technique which eliminates redundant information and thereby reduces the bandwidth.

The patent describes a single-pass digital video compression system which implements a two-dimensional cosine transform with intraframe block-to-block comparisons of transform coefficients without need for preliminary statistical matching or preprocessing.

Each frame of the video image is divided into a predetermined matrix of spatial subframes or blocks. The system performs a spatial domain to transform domain transformation of the picture elements of each block to provide transform coefficients for each block. The system adaptively normalizes the transform coefficients so that the system generates data at a rate determined adaptively as a function of the fullness of a transmitter buffer. The transform coefficient data thus produced is encoded in accordance with amplitude Huffman codes and zero-coefficient runlength Huffman codes which are stored asynchronously in the transmitter buffer. The encoded data is output from the buffer at a synchronous rate for transmission through a limited-bandwidth medium. The system determines the buffer fullness and

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adaptively controls the rate at which data is generated so that the buffer is never completely emptied and never completely filled.

In the system receiver, the transmitted data is stored in a receiver buffer at the synchronous data rate of the limited-bandwidth medium. The data is then output from the receiver buffer asynchronously and is decoded in accordance with an inverse of the encoding in the transmitter. The decoded data is inversely normalized and inversely transformed to provide a representation of the original video image.

The U.S. Pat. No. 4,302,775 patents reduces redundancy by employing intraframe coding techniques utilizing intraframe comparisons of cosine transform coefficients. While the patent provides significant improvement over other techniques, there is a need for even greater compression.

In addition to intraframe coding techniques, interframe coding techniques have been used to reduce the rate required for video transmission as described, for example, in the above-identified application. Typically, each video frame is held in memory at both the transmitter and the receiver and only frame-to-frame changes are transmitted over the communication link. In contrast to intraframe coding schemes in which the quality of coded images is dependent upon the amount of detail in each single image frame, the quality of the coded image in interframe coding is dependent upon the differences from frame to frame. Frame-to-frame differences are often referred to as "motion".

Interframe coding techniques are broadly classified into two categories, namely, spatial domain coding and transform domain coding. In real-time interframe spatial-domain coding systems, spatial domain data can be threshold processed to obtain and store frame difference signals in a transmitter buffer. The threshold value can be adaptively determined as a function of the transmitter buffer fullness. In order to eliminate the image breakdown, both spatial and temporal subsampling has been proposed.

The above-identified U.S. patent application entitled "A Combined Intraframe and Interframe Transform Coding System" employs intraframe and interframe variable prediction transform coding. Images are represented by sequential frames of two-dimensional arrays of digital signals. The digital signals are transformed to form transform coefficients for each frame. Predicted transform coefficients are formed using sets of variable prediction factors. The predicted transform coefficients for each frame are compared with corresponding actual transform coefficients for the frame to form transform coefficient difference signals. The difference signals are processed to control their range of values. The processed difference signals are statistically coded such that the more frequently occurring values are represented by shorter code lengths and the less frequently occurring values are represented by longer code lengths. The coded signals are stored in a buffer memory for transmission. The coded signals in the buffer memory are transmitted, over a limited-bandwidth medium, to the receiver along with processing information. The processing information includes codes identifying the set of variable prediction factors utilized in the transmitter. The same set of variable prediction factors is utilized in the receiver to reconstruct predicted transform coefficients which in turn are used to reconstruct representations of the original images in the transmitter.

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The extension of the Scene Adaptive Coding of U.S. Pat. No. 4,302,775 from intraframe coding to interframe coding has proven very significant in terms of improving image quality and reducing bandwidth. These improvements, however, have created a need for improved coding systems for reducing redundancy and there continues to be a need for improved signal processing methods and apparatus for data compression systems.

### SUMMARY OF THE INVENTION

The present invention is a signal processor and method for efficiently processing signals using ordered redundancy (OR) coding and any one of a number of different modes.

The signals to be coded are typically multiple values where the multivalued digital numbers,  $X(k)$  are typically the integers 0, 1, 2, 3, 4, . . . , and so on arranged in any order. Frequently, some values are repeated in forming digital numbers and hence the probable frequency of occurrence of some values is different than for other values. In one example of digital numbers, the highest frequency of occurrence is the value 0, the next highest frequency of occurrence is the value 1 and the other values greater than 1 (namely 2, 3, 4, 5, and so on) occur least frequently. With such order to the frequency of occurrence of values to be coded, the ordered redundancy coding of the present invention is most efficient.

Using ordered redundancy coding, the system codes the highest most frequently occurring values (0's in the usual example) using runlength coding. In the most preferable example, the runlength encoding is of two types, R and R'. The first type, R, is utilized when a runlength of consecutive zeros (0's) is followed by the next most frequently occurring value (1 in the usual case) and the other type, R', is utilized when the runlength of consecutive zeros (0's) is followed by some other value, one of the least frequently occurring values (usually greater than 1 such as 2, 3, and so on). Whenever the second type, R', of runlength coding is employed, the runlength code is typically followed by an amplitude code which explicitly encodes the actual amplitude (2, 3, . . . ) of the following other value. Whenever the first type, R, of runlength coding is employed, no coding of the second value (usually 1) is required because an amplitude of 1 is implied simply by the use of the first type, R, of runlength coding.

The ordered redundancy coding of the present invention is typically utilized in a system that processes input signals, such as spatial domain image signals occurring in successive frames, to form processed signals for each frame. Any number of different processing modes are possible. The processed signals are in the form of a plurality of multivalued digital numbers,  $X(k)$ , typically one number,  $X(k)$ , for each frame.

In one particular embodiment, the processing modes include two replenishment modes (one with motion compensation and one without), two DPCM modes (one with motion compensation and one without) and one intraframe mode. The decision as to which mode to select is made based upon an analysis of the frame-to-frame differences (motion) between the current input signals and the previous input signals.

Typically, the system determines differences between the current input signals and the previous input signals using mean-square difference signals. These mean-square signals are processed and compared with one or

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more thresholds for determining one of several modes of operation. After processing in some mode, the processed signals are in the form of digital numbers and these digital numbers are coded, using ordered redundancy coding, and transmitted to a receiver.

After transmission of the coded signals, the received signals are decoded and processed in reverse of the particular one of the modes by which the signals were processed in the transmitter.

In accordance with the above summary, the present invention achieves the objective of providing an improved signal processor for reducing redundancy using ordered redundancy coding.

The foregoing and other objects, features and advantages of the invention will be apparent from the following detailed description in conjunction with the drawings.

### BRIEF DESCRIPTION OF THE DRAWINGS

FIG. 1 depicts a block diagram of a transmitter and receiver system.

FIG. 2 depicts further details of the transmitter of the FIG. 1 system.

FIG. 3 depicts further details of the coder used in the FIG. 2 transmitter.

FIG. 4 depicts further details of the decoder used in the receiver.

### DETAILED DESCRIPTION

#### Overall System--FIG. 1

In FIG. 1, a block diagram of a transmitter and a receiver in accordance with the present invention is shown. Digital signals to be processed are input on lines 5 to the transmitter 2. The input signals on lines 5 are processed in one of a number of different modes so as to efficiently compress the data input signals to form processed signals for transmission to a receiver. The processed signals are coded and output on lines 45 from the transmitter 2 and are transmitted to the receiver 3.

The transmitter 2 includes a forward processor 52 and a feedback (reverse) processor 51. Typically, the input signals on lines 5 represent images and are presented in the space domain as frames in accordance with well known techniques. The forward processor 52 typically processes the spatial domain input signals to form processed signals which typically are transform domain signals arranged in blocks of transform domain coefficients. The forward processor 52 processes the current input signals from the most current frame.

The reverse processor 51 typically inverse processes signals from transform domain to spatial domain. Processor 51 stores signals representing the previous frame of data and also receives the current input signals so as to enable a comparison to be made between the previous inverse processed input signals and the current input signals. When the current input signals have been transformed from the spatial domain to the transform domain, the reverse processor performs an inverse transform to convert the transform domain signals back to spatial domain signals and stores those spatial domain signals for comparison with the current input spatial domain signals.

The reverse processor 51 determines changes between the current signals and the previous signals. Typically, these differences are determined using mean-square signals,  $d_0$  and  $d_b$ , hereinafter defined. These mean-square signals are processed and compared with



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one or more thresholds for determining one of several modes of operation for the system of FIG. 1.

Any number of different modes are possible. In one particular embodiment, two replenishment modes (one with motion compensation and one without), two DPCM modes (one with motion compensation and one without) and one intraframe mode are employed. The decision as to which mode to select is made based upon an analysis of the frame-to-frame differences (motion) of the input data. After the processing by the processor 52 and the processor 51, the processed signals are input to the coder 14.

The coder 14 encodes the processed signals using statistical frequency coding. With statistical frequency coding, signals with a statistically higher frequency of occurrence are encoded with a shorter code length than signals with a statistically lower frequency of occurrence. Additionally, the coder 14 utilizes a novel ordered redundancy (OR) coding technique. In the ordered redundancy coding, the processed signals to be coded have multiple values. For example, values are typically 0, 1, 2, 3, 4, . . . , and so on. Typically, the statistical frequencies of the values to be coded have an order. Particularly, that order is based upon the probable frequency of occurrence of the different values. The highest frequency of occurrence is typically the value 0, the next most frequently occurring value is 1 and the other values greater than 1 (2, 3, 4, 5, and so on) occur least frequently. With such order to the signals to be coded, the ordered redundancy coding of the present invention is most efficient.

Using OR coding, the coder 14 of FIG. 1 codes the highest most frequently occurring values (0's in the usual example) using runlength coding. In the most preferable example, the runlength encoding is of two types, R and R'. The first type, R, is utilized when the runlength of 0's is followed by the next most frequently occurring value (1 in the usual case) and the other type, R', is employed when the runlength of 0's is followed by some other value of the least frequently occurring type (usually greater than 1 such as 2, 3, and so on). Whenever the R' type of runlength coding is employed, the runlength code is typically followed by an amplitude code which explicitly encodes the actual amplitude of the other value. Whenever the first type, R, of runlength coding is employed, no coding of the second value (usually 1) is required because an amplitude of 1 is implied simply by the use of the first type, R, of runlength coding.

After the ordered redundancy coding in coder 14, data is transferred to the transmitter buffer 15. The buffer 15 provides a feedback signal on line 25 to control the forward processor 52 data rate.

In FIG. 1, the data from line 45 is input on line 68 after transmission over some conventional transmission medium to the receiver 3. In the receiver 3, a receiver buffer 53 stores the received data. A decoder 54 decodes the received data. Thereafter, the decoded data is processed in reverse of the particular one of the modes by which the data was processed in the transmitter 2. The reconstituted data appears on output line 69.

Transmitter—FIG. 2

FIG. 2 is a block diagram of a transmitter for motion compensated combined interframe and intraframe coding system of FIG. 1. Motion compensation is incorporated into a combined interframe and intraframe coding system using the spatial pixels in the inverse loop 9. In operation, the original spatial image on input lines 5 is

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compared to the reconstructed spatial image on lines 6 of the previous frame on a block-by-block basis through a motion detector 7. The reconstructed spatial image is obtained from the memory 18 of the feedback DPCM loop 9.

The feedback loop 9 includes the inverse normalizer 16, inverse transformer 17, the sum unit 20, the delay (memory) 18, the prediction unit 19, and the motion detector and compensator 7. If the motion detector 7 determines that there is little difference between the blocks, a "replenishment mode" is selected. On the other hand, if enough difference is detected, the block in the current frame is compared to the neighborhood of the corresponding reconstructed block in the previous frame to find the best match of the block. For the purpose of increasing the system performance a sub-pixel match is employed. If the difference between the current block and its best matched block does not result in a reasonable improvement over the difference between the current block and its original counterpart, a motion compensation is not justified. In this case, a "DPCM mode" with variable predictions is selected to handle the block difference. On the other hand, if the difference between the current block and its best matched block is reasonably smaller than the difference between the current block and its original counterpart, a motion compensation is initiated. In this case, the difference between the current block and its best matched block is screened to determine if the block belongs to a "motion compensated replenishment" block or a "motion compensated DPCM" block. The forward loop of the DPCM system encodes the "DPCM" or "motion compensated DPCM" data in the transform domain. Statistical frequency coding is employed to improve the efficiency. The feedback loop of the DPCM system is operated in the spatial domain with variable predictions.

Motion Detection and Compensation

The motion detection serves two purposes. It compares the block pixels in the present frame to the neighborhood pixels of the corresponding block in the previous frame to find the sub-pixel displacement of the block that gives the best match. It also tracks the displacement vectors and the degree of differences during the matching process for a subsequent modification of the DPCM frame memory and controlling of the predictor parameters in the feedback DPCM loop. Three basic types of modes (replenishment modes, intraframe mode, and DPCM modes) are determined from the motion detection. A decision process among the modes is employed. The decision process relies in part on a determination as to whether motion-compensation or non-motion-compensation is to be employed. Motion compensation is determined using the mean-square difference,  $d_0$ , and the mean square error,  $d_b$ .

The mean-square difference,  $d_0$ , is formed as follows:

$$d_0 = (1/N^2) \sum_{j=0}^{N-1} \sum_{k=0}^{N-1} [f(j,k) - \tilde{f}(j,k)]^2 \quad \text{Eq. (1)}$$

where  $f(j,k)$  are spatial pixels (on lines 5 of FIG. 2) of the current frame and  $\tilde{f}(j,k)$  are the corresponding pixels (on line 6 of FIG. 2) of the reconstructed previous frame.  $N$  is the transform block size.

The mean-square error,  $d_b$ , is formed as follows:

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$$d_b = (1/N^2) \sum_{j=0}^{N-1} \sum_{k=0}^{N-1} (f(j,k) - \hat{f}(j + \Delta_j, k + \Delta_k))^2 \quad \text{Eq. (2)}$$

where  $f(j,k)$  are the block pixels in the present frame and  $\hat{f}(j + \Delta_j, k + \Delta_k)$  are the best matched pixels in the previously reconstructed frame where  $\Delta_j, \Delta_k$  are the displacement (vector) for the best match.

#### Replenishment Modes

The replenishment modes are either motion-compensated or non-motion-compensated. The decision process selects compensation or non-compensation based upon motion detection. The motion detection unit 7 of FIG. 2 determines the difference between the incoming spatial pixels of a block and the reconstructed spatial pixels of the corresponding block in the previous frame. If the motion detection process determines that there is little frame-to-frame difference between corresponding blocks, a non-motion-compensated replenishment mode is selected and a code word is sent on line 21 from unit 7 of FIG. 2 to the encoder 14 to identify the mode.

If the motion detection process determines that the frame-to-frame block difference is great enough then, under some circumstances, a motion-compensated replenishment mode is selected. The detection process typically uses the mean-square difference,  $d_b$ , and compares it to a predetermined non-motion-compensated replenishment threshold,  $T_R$ . This process is written as follows:

if  $(d_b - d_0) < T_M$  and  $d_0 < T_R$ , select non-motion-compensated replenishment mode.

The detection process compares the mean square error,  $d_b$ , with a predetermined motion-compensated replenishment threshold,  $T_{D/R}$ , as follows:

if  $(d_b - d_0) > T_M$  and  $d_b < T_{D/R}$ , select motion-compensated replenishment mode.

The identification code words for the replenishment modes are typically Huffman coded. Typically, a one-bit code (0), on line 21 of FIG. 2 is used if the non-motion-compensated replenishment mode appears most frequently statistically. Once this code word is identified at the receiver, the reconstructed block pixels in the previous frame are repeated to form the present block in the receiver.

For the motion compensated replenishment block, typically a four-bit code (1111) is used, along with the displacement vector representing the best match, and appears on line 67 in FIG. 2. At the receiver, the vector uses the compensated block pixels from the reconstructed previous frame to form the presently reconstructed block.

#### DPCM Modes

The DPCM modes are either non-motion-compensated or motion-compensated. Selection of the compensation or non-compensation DPCM modes is dependant in part on motion detection. The motion detection searches for the best matched block pixels from the reconstructed previous frame. The difference,  $d_b$ , between the present block pixels and the best matched block pixels is then computed. If this difference is smaller than the motion threshold,  $T_M$ , no motion compensation is justified due to the necessity of sending the displacement vector as coding overhead. In this case, the difference,  $d_0$ , is compared to a DPCM threshold,  $T_{D/I}$ , to determine if the block belongs to a DPCM mode. The decision process is given as follows:

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if  $(d_b - d_0) < T_M$  and  $d_0 < T_{D/I}$ , select non-motion-compensated DPCM mode.

If a non-motion-compensated DPCM mode is selected, the predictor in the feedback loop is enabled and the difference is sent to the discrete cosine transformer for subsequent encoding. Again, the mode identification is Huffman coded. Typically, a two-bit code (10) used for the non-motion-compensated DPCM mode and appears on line 66 in FIG. 2.

At the receiver, the DPCM data are inversely transformed and added onto the block pixels from the reconstructed previous frame to form the present block pixels.

For the motion-compensated DPCM mode, the difference,  $d_b$ , between the current block pixels and the best matched block pixels is compared to a predetermined motion-compensated replenishment threshold,  $T_{D/R}$ . If  $d_b$  is larger than the threshold, a motion-compensated DPCM mode is selected to handle the pixel differences.

The decision process is given as follows:

if  $(d_b - d_0) > T_M$  and  $d_b > T_{D/R}$ , select motion-compensated DPCM mode.

For the motion compensated DPCM blocks, typically a three-bit code (110) is used together with the displacement vector representing the best match of the block along with the motion compensated DPCM data (transform coefficient differences between the present block and the best matched block from the reconstructed previous frame). The mode ID and vector appear on line 65 in FIG. 2. At the receiver, these DPCM data are inverse transformed and added onto the compensated block pixels from the reconstructed previous frame to form the present block pixels.

#### Intraframe Mode

The intraframe mode is selected when neither the motion-compensated mode nor the DPCM mode is justified. The difference,  $d_0$ , between the current block pixels and the reconstructed previous block pixels is compared with the predetermined DPCM threshold,  $T_{D/I}$ . The decision process is as follows:

if  $(d_0 - d_b) < T_M$  and  $d_0 > T_{D/I}$ , select intraframe mode.

If the intraframe mode is selected, the predictor is disabled and the current block pixels are sent to the transformer with unit 11 of FIG. 2. Typically, a four-bit code (1110) appearing on line 66 in FIG. 2 is used to identify the "intraframe mode". The intraframe data in the receiver are inversely transformed to form the present block pixels.

#### Compensation Range and Resolution

The performance of the motion compensated system is dependent upon the range and resolution of the matching process. The larger the range and the finer the resolution, the better the system performs. However, due to the necessity of encoding the vector information as system overhead, the range and resolution of the searching process is somewhat limited.

#### Searching Algorithm

The search for the best matched position is a very time consuming process. As one example, a simple binary search algorithm for a maximum range of 1.75 can be employed. Using such an algorithm, the nine whole-pixel positions centered around the position of the present block are first examined to find the best match. Next, the eight half-pixel neighborhood positions centered around the best matched whole-pixel position are examined. The process continues until the best matched quarter-pixel position is located. The horizontal and

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vertical addresses of this location are then recorded as a vector and encoded accordingly. The number of steps required for a binary search is many times lower than that of a brute force search.

Subpixel translation is done by performing bilinear interpolation taking weighted averages of the four nearest values at integral pixel positions surrounding the subpixel location. The weighting factors that are used are linear functions of the horizontal and vertical distance of the fractional displacement from the integral pixel positions. As an example, a displacement of 1.25 horizontally, and 0.75 vertically is performed as follows:

$$f(j+1.25, k-0.75) = w_1 f(j+1, k) + w_2 f(j+1, k-1) + w_3 f(j+2, k) + w_4 f(j+2, k-1) \quad \text{Eq. (3)}$$

where  $w_1=(0.75)(0.25)$ ,  $w_2=(0.75)(0.75)$ ,  $w_3=(0.25)(0.25)$ , and  $w_4=(0.25)(0.75)$

DPCM Loop

Referring to FIG. 2, the Differential Pulse Code Modulated (DPCM) loop consists of a cosine transform unit 11, a normalization unit 12, a quantization unit 13, an inverse normalization unit 16, an inverse transform unit 17, a delay memory 18, and a prediction unit 19. In operation, an input pixel block on lines 5 from the present frame is first subtracted in subtractor 10 by its estimation from the previous frame on line 23 on a pixel-by-pixel basis to generate block differences. These differences are then cosine transformed in transform unit 11 to form the coefficient differences on lines 24. The coefficient differences are next scaled in normalizer unit 12 according to a feedback parameter on lines 25 from the output rate buffer 15. The scaled coefficient difference on lines 26 are then quantized in unit 13 and fed into both the coder unit 14 and the inverse DPCM loop 9. In the inverse DPCM loop 9, the quantized and scaled data are inversely normalized in unit 16 and inversely transformed in unit 17, to form the quantized coefficient differences on lines 27. These differences are then added in adder 20 to the motion compensated estimation on lines 3 to form the reconstructed pixel block in the frame memory 18. After a single-frame delay, in memory 18, the motion detector 7 uses the motion compensated block from the memory 18, multiplies it by a prediction weighting factor, and is ready for the next frame of operation. At the receiver, the received data follows the inverse DPCM loop to reconstruct the spatial pixels in the output block.

Cosine Transform

The coefficient differences between the input pixels from the present frame on lines 5 and the estimations from the previously reconstructed frame on lines 3 are formed by the difference circuit 10 on lines 23 and are expressed as follows:

$$c_n(j, k) = f_n(j, k) - \rho(j, k) \hat{f}_{N-1}(j + \Delta j, k + \Delta k) \quad \text{Eq. (4)}$$

where  $\Delta j$  and  $\Delta k$  represent the vector values for the best match determined by the motion detector and where  $\rho(j, k)$  represents the estimation. These differences within a  $N \times N$  block are cosine transformed in transformer 11 to form the coefficient differences on lines 24. The cosine transform is defined as follows:

$$E_n(u, v) = 4[C(u)C(v)]/N^2 \sum_{j=0}^{N-1} \sum_{k=0}^{N-1} c_n(j, k) \quad \text{Eq. (5)}$$

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-continued

$$\cos[(2j+1)u\pi/2N] \cos[(2k+1)v\pi/2N]$$

for  $u, v = 0, 1, \dots, N-1$

$$C(w) = 1/(2^w) \quad \text{for } w = 0$$

$$= 1 \quad \text{for } w = 1, 2, \dots, N-1$$

where  $w=u$  or  $v$

where  $(j, k)$  and  $(u, v)$  represent indices in the horizontal and vertical directions for the pixel difference and coefficient difference blocks, respectively, and where  $C(w)$  represents  $C(u)$  or  $C(v)$ . The cosine transform restructures the spatial domain data into the coefficient domain such that it will be beneficial to the subsequent coding and redundancy removal processes.

Normalization

The coefficient differences,  $E_n(u, v)$ , are scaled according to a feedback normalization factor,  $D$ , on lines 25, from the output rate buffer 15 according to the relation,

$$I_n(u, v) = E_n(u, v)/D \quad \text{Eq. (6)}$$

The scaling process adjusts the range of the coefficient differences such that a desired number of code bits can be used during the coding process.

Quantization

The quantization process in unit 13 is any conventional linear or non-linear quantization. The quantization process will set some of the differences to zeros and leave a limited number of significant other differences to be coded. The quantized coefficient differences on lines 28 are represented as follows:

$$\bar{I}_n(u, v) = Q\{I_n(u, v)\} \quad \text{Eq. (7)}$$

where  $Q\{ \}$  is a quantization function.

It should be noted that a lower bound is determined for the normalization factor in order to introduce meaningful coefficient differences to the coder. Generally speaking, setting the minimum value of  $D$  to one is sufficient for a low rate compression applications involving transform blocks of 16 by 16 pixels. In this case the worst mean square quantization error is less than 0.083. This mean square error corresponds to a peak signal-to-quantization-noise ratio of 40.86 db which is relatively insignificant for low rate applications.

Inverse Normalization

The process of inverse normalization in unit 16 produces the quantized coefficient differences on lines 29 in the inverse DPCM loop 9. This process is represented as follows:

$$\bar{E}_n(u, v) = \bar{I}_n(u, v)D \quad \text{Eq. (8)}$$

Inverse Cosine Transform

The inverse cosine transform process in unit 17 in the inverse DPCM loop 9 converts the quantized coefficient differences on lines 29 back to the spatial domain pixel differences on lines 27. This process is defined as follows:

$$\hat{c}_n(j, k) = \sum_{u=0}^{N-1} \sum_{v=0}^{N-1} C(u)C(v)\bar{E}_n(u, v) \quad \text{Eq. (9)}$$

$$\cos[(2j+1)u\pi/2N] \cos[(2k+1)v\pi/2N]$$

for  $j, k = 0, 1, \dots, N-1$ .

Frame Memory

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The frame memory 18 contains the reconstructed input pixels in the inverse DPCM loop. The quantized pixel differences from the inverse cosine transformer on lines 27 and the motion compensated estimations from the previously reconstructed frame on lines 3 are added together in adder 20 to form the reconstructed pixels,  $\hat{f}_n(j,k)$ , which replace the block pixels in the memory 18. This process is represented as follows:

$$\hat{f}_n(j,k) = z_n(j,k) + \rho(j,k) \hat{f}_{n-1}(j+\Delta j, k+\Delta k) \quad \text{Eq. (10)}$$

**Prediction**

The prediction process in unit 19 finds an estimation of a datum from its surrounding data. By way of example for a simple predictor that uses the previous frame as a base for the estimation, the estimated value is termed as the correlation coefficient,  $\rho(j,k)$ , given as follows:

$$\rho(j,k) = E\{e_n(j,k)e_{n-1}(j+\Delta j, k+\Delta k)\} / \sigma^2(j,k) \quad \text{Eq. (11)}$$

where E represents expected value and  $\sigma^2(j,k)$  represents the variance of  $e_n(j,k)$ . The correlation coefficient, termed as leak factor, ranges from 0 to 1 depending on the frame-to-frame pixel differences. The value is very close to 1 for a limited motion sequence. However, during a scene cut or a rapid zooming sequence, the value is way below the value of 1. Because different leak factors have to be identified in the encoding of the DPCM process, it represents a significant overhead for the low rate system if too many values are to be identified. In one embodiment, only two leak factor values are used for the five-mode motion detection system: 1 for the non-motion-compensated DPCM and motion compensated DPCM modes and 0 for the intraframe mode.

**Coding**

In order to minimize overhead code bits, in one typical example the encoding process in unit 14 for the FIG. 2 system is performed on a frame by frame bases. The coded bit stream includes sync, header, scaling factor (NF), and variable-length data as follows:

TABLE 1

			variable
SYNC	HEADER	NF	DATA

In the header, at least one bit is reserved for the identification of full motion and graphic operations. The data portion includes the block-to-block mode identifiers, the vector values, DPCM and intraframe data. The bit allocations are dependent upon each individual block which is illustrated in TABLE 2.

TABLE 2

1		
MODE		
Replenishment Block		
4		8
MODE	VECTOR	
Replenishment of Motion Compensated Block		
2		variable
MODE	DPCM	EOB
DPCM of Non-motion Compensated Block		
4		variable
MODE	INTRAFRAME	EOB
Intraframe of Non-motion Compensated Block		

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TABLE 2-continued

3	8	variable	
MODE	VECTOR	DPCM	EOB
DPCM of Motion Compensated Block			

**DPCM Encoding**

The Scene Adaptive Coding (SAC) is very efficient in terms of coding the intraframe transform coefficients. When this scheme is applied to a coding system involving intraframe, interframe and motion compensation, the coding efficiency is somewhat reduced due to the structure of coefficient differences or motion compensated coefficient differences caused by the additional removal of redundancies. One observation that can be made in the motion compensated coefficient differences (non-zero after normalization and quantization) and, to a certain degree, the interframe coefficient differences (non-zero differences) is that most of these differences are sparsely distributed with an overwhelming majority of them having an absolute value of one. Also, within these differences of ones, a significant portion of them are isolated (surrounded by zero-valued coefficients) along the path of a scanning. It is wasteful to use one amplitude code word to code each of these isolated ones in addition to using one runlength code word to identify their address (Runlength alone should be enough).

**Ordered Redundancy Coding**

A new Ordered Redundancy (OR) coding algorithm is specifically designed to code multi-valued digital numbers where the statistical frequency of occurrence of some values in the series of values forming the digital number is greater than the statistical frequency of occurrence for other values in the series of values forming the digital number. The values forming the digital numbers are generally the integers 0, 1, 2, 3, . . . and so on.

In general, a K-valued digital number, X(k), is formed by a series of K values, x(k), as follows:

$$X(k) = x(1), x(2), x(3), \dots, x(k), \dots, x(K)$$

where  $1 \leq k \leq K$ . Each value, x(k), has some value,  $V_j$ , from the set of J values,

$$V_1, V_2, V_3, \dots, V_j, \dots, V_J$$

where  $1 \leq j \leq J$ .

The occurrence of i consecutive values,  $V_j$ , within the series X(k) is the runlength of such values denoted by  $V_j^i$ .

In a first example with  $k=1, \dots, 14$ , if the digital number  $X_1(k) = 01000000100021$ ,  $V_0=0$ ,  $V_1=1$  and  $V_2=2$  then  $X_1(k) = V_0^1, V_1^1, V_0^6, V_1^1, V_0^3, V_2^1, V_1^1$ . In the series values forming  $X_1(k)$ , the first value  $V_0=0$  occurs most frequently, the second value  $V_1=1$  occurs next most frequently, and the other value  $V_2=2$  occurs least frequently.

In a second example with  $k=1, \dots, 14$ , if the digital number  $X_2(k) = 02111110001130$ , and  $V_0=1$ ,  $V_1=0$ ,  $V_2=2$ , and  $V_3=3$ ; then  $X_2(k) = V_1^1, V_2^1, V_0^3, V_1^3, V_0^2, V_3^1, V_1^1$ . In the series of values forming  $X_2(k)$ , the first value,  $V_0=1$ , occurs most frequently, the second value  $V_1=0$  occurs next most frequently, and the other values,  $V_2=2$  and  $V_3=3$ , occur next most frequently.

Digital numbers formed with such frequencies of occurrence of values such as for  $X_1(k)$  and  $X_2(k)$  above, are defined as having ordered redundancy. In the typi-

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cal example described for  $X_1(k)$ , 0's are most redundant, 1's are next most redundant, and so on. The frequency of occurrence order of values 0, 1, 2, . . . and so on described is merely one typical example. Any frequency of occurrence order is possible, for example, the 2's may occur more frequently than 1's and 0's may occur more frequently than 2's.

Digital numbers,  $X(k)$ , will often have ordered redundancy of the values,  $V_j$ , forming the number. Ordered redundancy means that the frequency of occurrence of some of the values,  $V_j$ , forming the number (or groups of such values) is greater than that for other values (or other groups of such values) forming the number and that such frequencies of occurrence are predictable for a number of digital numbers,  $X(k)$ .

When such ordered redundancy occurs, the ordered redundancy coding of the present invention is useful in making the coding more efficient. In the present invention, the presence of a first value (or a first set of values) is used to imply the existence of a second value (or a second set of values) thereby eliminating the need to code the second value (or second set of values).

By way of example, the coding of the digital number  $X_1(k)$  above is achieved as follows. Assume that when the first value,  $V_0$ , is followed by the second value,  $V_1$ , that the second value is implied and such code is denoted  $C_{01}^i$  where  $i$  represents the number of consecutive first values  $V_0$  preceding the implied second value,  $V_1$ . Assume that when the first value  $V_0$  is not followed by the second value,  $V_1$ , such code is denoted  $C_{01}^i$ . Assume that any other value is amplitude coded with  $A_2=2$  and  $A_3=3$ . With such a notation,  $X_1(k)=C_{01}^1, C_{01}^6, C_{01}^3, A_3, C_{01}^0$ .

By way of the second example,  $X_2(k)$  above, the first value,  $V_0=1$  implies the second value,  $V_1=0$  such that  $X_2(k)=C_{01}^0, C_{01}^3, A_2, C_{01}^5, C_{01}^0, C_{01}^0, C_{01}^2, A_3, C_{10}^0$ .

In order to code  $X_1(k)=C_{01}^1, C_{01}^6, C_{01}^3, A_3, C_{01}^0$ , each of the values  $C_{01}^1, C_{01}^6$  and so forth are represented by a unique statistical code (typically a binary code) from a runlength table such that the statistically more frequently occurring values have shorter code lengths and the statistically less frequently occurring values have longer code lengths.

A series of values in digital numbers having a large percentage of zeros (0's) followed by ones (1's) is termed "One's Redundancy". One's Redundancy Coding is one example of Ordered Redundancy (OR) coding. The OR coding procedures for One's Redundancy appear in TABLE 3 and are based upon  $16 \times 16$  transform blocks of values where each such block gives rise to a digital number,  $X(k)$ , having 256 values. Of course, any size blocks ( $N \times M$ ) of digital values can be selected. Also, the digital values can be in block form representing transform coefficients or can be multi-valued digital signals,  $X(k)$ , of any form.

In order to identify the beginning or end of the values forming a number,  $X(k)$ , a special "End of Block" signal, EOB, is utilized. When a plurality of numbers  $X_1(k), X_2(k), X_3(k), \dots$  and so on are to be coded and transmitted, the EOB code is inserted between the numbers, usually once after each number.

The TABLE 3 example is premised upon digital signals having first values  $V_1=0$ , second values  $V_2=1$ , and a set of other values,  $V_3$ , greater than 1 (2, 3, 4, . . .). Also, TABLE 3 has a runlength table partitioned into first and second parts, a first part, R (or  $C_{01}$ ), and a second part, R' (or  $C_{01}$ ). The first part, R, implies that a

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runlength of 0's is followed by a 1. The second part, R', implies that a runlength of 0's is followed by another value greater than 1 (2, 3, 4, . . .). The TABLE 3 formulation is for one preferred embodiment of the ordered redundancy coding. Many variations, some hereinafter described, are possible.

TABLE 3

1. From the magnitude (without sign) of quantized coefficient difference, form the following sets of histograms
  - a. Runlength of consecutive zero-value coefficient differences (including runlength of zero length) with absolute amplitude value of one at the end of the runlength.
  - b. Runlength of consecutive zero-valued coefficient differences (including runlength of zero length) with absolute amplitude value of greater than one at the end of the runlength.
  - c. Occurrence of end of blocks (EOB, all 0's)
2. Get runlength Huffman code table from the histogram of 1 above. The entries of this table can be represented as  $R_0, R_1, R_2, \dots, R_{255}, R'_0, R'_1, R'_2, \dots, R'_{255}, EOB$ .
3. From case b of 1, get the histogram of the amplitudes (with values greater than one) at the end of the runlength.
4. Get amplitude Huffman code table from the histogram of 3 above. The entries of this table can be represented as  $A_2, A_3, A_4, \dots, A_{510}$ .
5. Encode the coefficient differences along the zig-zag path from the Huffman tables generated from 2 and 4 in the following fashion.
  - a. Coefficient differences of one at the end of the consecutive zeros—encode with  $R+SIGN, n=1, 2, 3, \dots, 255$ .
  - b. Coefficient differences of greater than one at the end of consecutive zeros—encode with  $R'+A_m+SIGN, n=1, 2, 3, \dots, 255$  and  $m=2, 3, 4, \dots, 510$ .
6. Encode with EOB at the end of each block.

As can be seen from TABLE 3, two Huffman tables or equivalent statistical coding tables are specified in the "One's Redundancy" (OR) coding. The runlength table (including EOB) consists of two parts, R and R', with a total of 513 entries (256 each for the first part R and the second part R' and 1 for EOB). The amplitude table consists of 509 entries (amplitude values of 2 to 510). In a practical implementation, these two tables can be shortened with little performance degradation.

Specific examples of the two tables specified in accordance with TABLE 3 appear as the following TABLES 6 and 7. TABLE 6 is a runlength table of the two part example (R and R' or  $R_1$  and  $R_2$ ) where R implies a runlength of 0's followed by a 1. TABLES 6 and 7 are derived based upon the hardware constraints (which are intended to be representative of a practical system, but are not intended to be limiting) of the following TABLE 4:

TABLE 4

1. Every code word must belong to part of a complete "tree".
2. The longest code word (including runlength escape, runlength code and sign, or amplitude escape and amplitude code) must not exceed 16 bits in length.
3. The maximum number of entries for each runlength or amplitude table must not exceed 32.

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TABLE 5 gives four comparative examples for coding digital numbers using Scene Adaptive Coding (SAC) and One's Redundancy (OR) coding. The One's Redundancy coding examples utilize TABLES 6 and 7 and the Scene Adaptive Coding examples utilize TABLES 8 and 9. As can be seen from TABLE 5, the OR coding is considerably shorter than the SAC coding and hence OR coding is more efficient.

TABLE 5

COMPARISON OF "OR" AND "SAC" CODING	
1.	CO 00000000000000001 EOB SAC RLP+R <sub>1</sub> +A <sub>1</sub> +S+EOB 01/111011/11/0/10001 OR R <sub>1</sub> +S+EOB 0001000/0/0010
2.	CO 001-100001000-1 EOB SAC RLP+R <sub>2</sub> +A <sub>1</sub> +S+A <sub>1</sub> +S+RLP+R <sub>3</sub> +A <sub>1</sub> +S+RLP+R <sub>3</sub> +A <sub>1</sub> +S+EOB 01/1111/11/0/11/01/11010/11/0/01/1011/11/1/10001 OR R <sub>2</sub> +S+R <sub>0</sub> +S+R <sub>3</sub> +S+R <sub>3</sub> +S+EOB 1110/0/10/1/00011/0/0000/1/0010
3.	CO 20000000-1 EOB SAC A <sub>2</sub> +S+RLP+R <sub>7</sub> +A <sub>1</sub> +S+EOB 101/0/01/110011/11/1/100001 OR R <sub>0</sub> +A <sub>2</sub> +S+R <sub>7</sub> +S+EOB 110/1/0/011110/1/0010
4.	CO 1001-20001 EOB SAC A <sub>1</sub> +S+R <sub>2</sub> +A <sub>1</sub> +S+A <sub>2</sub> +S+R <sub>4</sub> +A <sub>1</sub> +S+EOB 11/0/1111/11/0/101/1/11100/11/0/10001 OR R <sub>0</sub> +S+R <sub>2</sub> +S+R <sub>0</sub> +A <sub>2</sub> +S+R <sub>4</sub> +S+EOB 10/0/1110/0/11011/01101/0/0010

where,  
R=runlength, A=amplitude, S=positive sign,  
S̄=negative sign, RLP=Run Length Prefix (01),  
EOP=End Of Block, CO=digital number to be coded

TABLE 6

RUN LENGTH CODE TABLE FOR THE "ONE'S REDUNDANCY" CODING				
RUN LENGTH CODES FOR DPCM MODE				
T	L	FREQ	# of BITS	OCTAL EQUIV
R	0	26644.	2	10
R'	0	15621.	3	110
R	1	12324.	3	010
R	2	7148.	4	1110
R	3	4610.	4	0000
R	4	3584.	5	01101
R'	1	3143.	5	01100
R	5	2577.	5	00011
R	6	1967.	6	111100
R	7	1764.	6	011110
R	8	1452.	6	001111
R	9	1327.	6	001101
R	10	1089.	6	000101
R'	2	1013.	7	1111011
R	11	994.	7	1111010
R	12	884.	7	0111011
R	13	876.	7	0111010
R	14	861.	7	0011100
R	15	687.	7	0011100
R	16	673.	7	0011001
R	17	602.	7	0011000
R	18	550.	7	0001001
R	19	496.	7	0001000
R	20	485.	8	0111101
R	21	455.	8	0111100
R	22	413.	8	0111001
R'	3	402.	8	0111000
R	23	370.	8	0011101
R	24	345.	8	00111010
R	ESC	4599.	5	11111
R'	ESC	982.	7	0111111

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TABLE 6-continued

RUN LENGTH CODE TABLE FOR THE "ONE'S REDUNDANCY" CODING				
RUN LENGTH CODES FOR DPCM MODE				
T	L	FREQ	# of BITS	OCTAL EQUIV
EOB		3047.	4	0010

10 where,  
R ESC=code used whenever R-type value not in table  
R' ESC=code used when R'-type value not in table.

TABLE 7

AMPLITUDE CODE TABLE FOR THE "ONE'S REDUNDANCY" CODING					
AMPLITUDE CODES FOR DPCM MODE					
A	FREQ	# of BITS	CODE	OCTAL EQUIV	
A	2	11076.	1	1	1
A	3	3846.	2	00	0
A	4	1751.	4	0110	6
A	5	982.	5	01111	17
A	6	663.	5	01010	12
A	7	435.	6	01100	34
A	8	347.	6	010011	23
A	9	277.	6	010001	21
A	10	173.	7	0101100	54
A	11	178.	7	0101101	55
A	12	137.	7	0100100	44
A	13	113.	8	01110101	165
A	14	116.	8	01110110	166
A	15	79.	8	01001010	112
A	16	68.	8	01000011	103
A	17	67.	8	01000010	102
A	18	58.	9	011101110	356
A	19	49.	9	011101000	350
A	20	50.	9	011101001	351
A	21	30.	10	0111011111	737
A	22	32.	9	01000010	202
A	23	33.	9	01000011	203
A	24	20.	10	0100101100	454
A	25	31.	9	01000001	201
A	26	22.	10	0100101101	455
A	27	30.	9	01000000	200
A	28	23.	10	0100101110	456
A	29	14.	11	01001011111	1137
A	30	14.	11	01110111100	1674
A	31	10.	11	01001011110	1136
A	32	14.	11	01110111101	1675
A	ESC	423.	6	010111	27

where,  
ESC=code used when amplitude value not in table.

TABLE 8

RUN-LENGTH CODES FOR "SCENE ADAPTIVE CODING"			
VALUE	LENGTH	HUFFMAN CODE	
1	1		0
2	4		1111
3	4		1011
4	5		11100
5	5		11010
6	5		10000
7	6		110011
8	6		110010
9	6		110001
10	6		110000
11	6		101011
12	6		101001
13	6		101000
14	6		100111
15	6		100110
16	6		100101
17	6		100100
18	6		100010

TABLE 8-continued

RUN-LENGTH CODES FOR "SCENE ADAPTIVE CODING"		
VALUE	LENGTH	HUFFMAN CODE
19	7	1110111
20	7	1110110
21	7	1101111
22	7	1101110
23	7	1101101
24	7	1101100
25	7	1010101
26	7	1000111
27	7	1000110
28	8	10101000
29	9	101010011
30	9	101010010
RL-ESC	6	111010

TABLE 9

AMPLITUDE CODES FOR SCENE ADAPTIVE CODING		
VALUE	LENGTH	HUFFMAN CODE
1	2	11
2	3	101
3	3	000
4	4	0011
5	5	10001
6	5	00100
7	6	100101
8	6	100000
9	7	1001110
10	7	1001100
11	7	0010111
12	8	10011111
13	8	10011011
14	8	10010011
15	8	10010001
16	8	00101101
17	9	100111101
18	9	100110101
19	9	100101010
20	9	100100100
21	9	100100000
22	9	001011001
23	9	001011000
24	10	1001111001
25	10	1001111000
26	10	1001001011
27	10	1001001010
28	10	1001000011
29	10	1001000010
AMP-ESC	6	001010
EOB	6	100001
RL-PREFIX	2	01

Ordered Redundancy Variations

Additional variations are possible, for example, three or more parts or their equivalent may be used in the runlength table. A typical example with three parts (R, R' and R'') is as follows. Runlengths of consecutive first values (V<sub>1</sub>=0) are runlength encoded with three different parts (R<sub>1</sub>, R<sub>2</sub>, or R<sub>3</sub>) depending upon the value following the runlength of 0's. If the following value is a second value (such as V<sub>2</sub>=1), then R<sub>1</sub> is selected for encoding the runlength of the first value (0's in this case). If the following value is a third value (such as V<sub>3</sub>=2), then R<sub>2</sub> is selected for encoding the runlength of the first value (0's in this case). If the following value is another value (greater than 2 such as 3, 4, 5, ...), then R<sub>3</sub> is selected for encoding the runlength of the first value (0's in this case). If R<sub>3</sub> is selected, then R<sub>3</sub> is followed by an amplitude code to specify the exact value (3, 4, 5, ...) following the runlength of first values (0's).

The runlength table utilized with ordered redundancy coding can be of two parts (R and R'), three parts

(R<sub>1</sub>, R<sub>2</sub>, and R<sub>3</sub>), or more generally of "n" parts (R<sub>1</sub>, R<sub>2</sub>, ..., R<sub>n</sub>), where n is equal to or greater than 2.

The TABLES 6 and 7 were formed based upon the assumption that a separate sign bit, S or S̄, not in the tables is to be used to indicate the sign of each value coded in the manner indicated in TABLE 5. Alternatively, the sign information can be encoded into TABLE 6 or TABLE 7. For example, a table like TABLE 6 can be used to represent runlengths of 0's that are followed both by positive and by negative non-zero numbers. Such a table would be greater in length than TABLE 6 (expanded essentially to double the length) to provide entries for runlengths of 0's followed by both negative and positive non-zero numbers. Of course, such a table would be ordered in accordance with the statistical frequency of both positive and negative numbers.

The two tables, TABLES 6 and 7, were formed based upon the assumption that the values to be coded were categorized into three basic groups or values, namely a first value, V<sub>1</sub>, a second value, V<sub>2</sub>, and all other values. In the particular example of coding, the first value V<sub>1</sub> is 0, the second value V<sub>2</sub> is 1, and the third value is one within the set of all values greater than 1. It often occurs that in a block of values to be coded, the value 0 (the first value) occurs statistically most frequently, the value 1 (the second value) occurs statistically second most frequently, and the other values (the third values) the least frequently.

With such a distribution having ordered redundancy, the coding of the second value (1's in this case) is avoided because the first value (0's in this case) is runlength coded in two parts, one part that implies that the number following the runlength of 0's is the second value (1 in this case) and the other part that indicates that the number following the runlength of 0's is within the set of third values (values greater than 1 in this case).

Alternative formulations are possible. For example, rather than categorizing the values to be coded into three groups as done in connection with TABLE 6, four or more groups are possible. For four groups, the first value (for example V<sub>1</sub>=0) is coded in three parts, namely, a first part for implying a second value (for example V<sub>2</sub>=1), a second part for implying a third value (for example V<sub>3</sub>=2) and a third part for indicating a set of fourth values (values greater than 2).

In general, a multivalued digital number, X(k), to be coded with n-1 implied values has a first value, V<sub>1</sub>, a second value, V<sub>2</sub>, ..., a j-value, V<sub>j</sub>, a (j+1)-value, V<sub>j+1</sub>, ..., a n-value, V<sub>n</sub>, for j ranging from 1 to n, and has other values. The digital signals are coded with n-1 implied values to form statistically coded signals such that the more frequently occurring values of the digital signals are represented by shorter code lengths and the less frequently occurring values of coded signals are represented by longer code lengths. The coding includes, for each value, V<sub>j</sub>, for j from 1 to n, forming j<sup>th</sup> runlength code values representing the number of consecutive first values followed by the j+1 value, forming additional runlength code values representing the number of consecutive first values followed by any of said other values.

While the embodiments described have used one code (such as R) based upon the existence of a runlength of a first value to imply a second value, the implied code is not limited to a single value but can be itself multivalued. For example, a runlength of 0's followed by two 1's can be implied by a code R''.

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While the implied coding of the second value was typically as a result of runlength coding the first value, other types of coding of the first value are included within the present invention.

As another alternative, the statistically most frequent value is not necessarily the value that is runlength encoded. Where three groups of values are employed (such as 0's, 1's and greater than 1's), the second value (1's in this case) can be runlength encoded to imply the first value (0's in this case) or to specify the third values (numbers greater than 1 in this case).

In an example where the number of values  $V_j$  are limited, the need for amplitude coding can be eliminated. For example, if only the values  $V_1=0$  and  $V_2=1$  are present in the number  $X(k)$ , then no amplitude coding is required since the  $V_1=0$  values can be runlength coded and the values of  $V_1=1$  can be implied. Similarly, for an example with only the values  $V_1=0$ ,  $V_2=1$ , and  $V_3=2$ , the values of  $V_1=0$  can be runlength coded while both  $V_2=1$ , and  $V_3=2$ , are implied using a two-part runlength table as previously described.

In an example where all of the values have the same sign, the sign coding can be eliminated.

#### Coder Details—FIG. 3

In FIG. 3, further details of the coder 14 of FIG. 2 are shown. In FIG. 3, each digital value,  $V_j$  of a digital number,  $X(k)$ , to be coded is input to the CO register 76. Typically, the register 76 is a 16-bit register for storing 16-bit values where the digital number,  $X(k)$ , is formed of  $K$  16-bit values, each value clocked into register 76 in sequence and one at a time. The comparator 77 compares the absolute value of each value in register 76 to determine if that absolute value is less than 1, equal to 1, or greater than 1. Comparator 78 provides a less-than-1 output signal on line 78, an equal-to-1 signal on line 79, and a greater-than-1 signal on line 80 as a function of the value in register 76. The less-than-1 signal on line 78 indicates an equal-to-0 condition. The control 81 receives the three control values on line 78, 79 and 80 from comparator 77 and controls, in a conventional manner, the coder operations.

The "zero" counter 82 counts the runlength of consecutive zeros detected by the comparator 77. Line 86 from control 81 causes counter 82 to be set to a counting mode for counting consecutive 0 values in register 76. Line 86 causes counter 82 to be reset after each runlength of zeros is counted. After being reset and with line 86 setting counter 82 to the counting mode, counter 82 will count zeros until a non-zero value is detected in register 76. If a non-zero value is detected, either a equal-to-1 signal on line 79 or a greater-than-1 signal on line 80 is enabled and detected by control 81. If an equal-to-1 signal is detected, control 81 asserts the line 87 to specify the R type of operation. The enable line 87 together with the runlength count from counter 82 addresses the runlength table 84. Runlength table 84 is typically a random access memory or a read only memory storing coded runlength values like those of TABLE 6. The 0 runlength output on line 95 from counter 82 together with the 1-bit on line 87 address the table 84 to provide a runlength coded value output on lines 93. The output from table 84 is under control of the signal on line 89 from control 81 and loads the code register 85 with the runlength coded value from the CODE column of TABLE 6. The runlength coded value implies that a runlength of zeros is followed by a 1 in the manner previously described.

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After a coded value is loaded into register 85, the sign bit from register 76 is enabled to be stored in register 85 by the enable gate 91 under control of the signal 94 from the control 81.

Thereafter, the next value,  $V_j$  of the number,  $X(k)$ , is loaded into register 76. Counter 82 is cleared and a new runlength of zeros is counted until comparator 77 detects a non-zero value by asserting either an equal-to-1 signal on line 79 or a signal on line 80 signifying a greater-than-1 value in register 76. If the runlength of zeros is followed by a value greater than 1, then line 80 is asserted and control 81 causes line 87 to be not asserted, thereby signifying an R'-type of operation. The runlength value from counter 82 on line 95 together with the non-asserted signal on line 87 causes the runlength table 84 to be addressed to obtain a R' value from table 84. Line 89 causes the output from table 84 to be gated to the code register 85.

Because of a greater than 1 value in register 76, control 81 causes the line 88 to be next enabled to provide an output from the amplitude table 83. The amplitude table 83 is a random access memory or read only memory loaded with amplitude values like those of TABLE 7. The value in register 76 addresses the amplitude table 83 to provide the appropriate amplitude value output on line 93 for storage in the code register 85. Thereafter, the control 81 causes line 94 to be enabled to cause the sign value from register 76 to be stored in the code register 85.

The FIG. 3 coder continues to process code values in register 76 until an entire block of code values (all values for a digital number,  $X(k)$ ) has been processed. Control 81 includes counters and other appropriate means for counting or otherwise determining all values comprising a digital number. When a full series of values for a digital number  $X(k)$  has been processed, control 81 enables the output line 93 to provide an end of block, EOB, signal on line 93 for storage in the control register 85. Control 81 provides the  $CLK_1$  signal for clocking each new value into register 76, provides the  $CLK_2$  signal for incrementing the zero counter 83 and  $CLK_3$  signal for clocking values into register 44. In a conventional manner, control 81 is controlled by a master clock signal CLK, from the transmitter of FIG. 2.

In FIG. 3, when the amplitude table 83 is addressed and produces the ESC code, the ESC detector 126 senses that no amplitude value is available in the table and signals control 81. The ESC value from table 83 is gated into the code register 85. Thereafter, control 81 enables gate 127 via line 181 to gate the value from register 76 into the code register 85. Alternatively, an additional table (not shown) can be provided for storing Huffman coded values of amplitudes not in the table 83. Such an additional Huffman table would provide compression of additional amplitude values.

In FIG. 3, when the runlength table 84 provides the R ESC or the R' ESC code value, the ESC detector 126 senses the ESC value and signals the control 81 on line 130. The ESC code value is clocked into register 85, and on the next cycle, control 81 causes alternate processing to occur. In the example described, gate 129 is enabled to enter directly the value from counter 82 into the code register 85 so that runlengths not in the runlength table 84 are directly entered after the ESC code. Alternatively, an additional runlength table with Huffman coded runlength values can be employed to provide additional compressed runlengths not in the table 84.



While FIG. 3 depicts one embodiment for implementing the coder 14 of FIG. 2, many other software and hardware implementations of the coder are, of course, possible.

Decoder Detail—FIG. 4

In FIG. 4, further details of the decoder 54 of FIG. 1 are shown. The serial-by-bit data is input on line 117 to the code register 101. The input data, as it is clocked into the register 101 by the CLK<sub>4</sub> signal, is continuously detected by the detector 102. Detector 102 senses the synchronization, header and other control information and signals the control 107 when coded data is to follow. The coded data is clocked into register 101 one bit at a time. A code value clocked into register 101 is presented in left-to-right order when viewing the CODE column of TABLE 6. With each new code value bit, the coded data from register 101 is input to the inverse runlength table 103 and to the inverse amplitude table 104. The runlength table 103 includes the data of TABLE 6 organized in an inverse order. The inverse order means that table 103 of FIG. 4 is addressed by the CODE column code values and provides as an output the type (R or R') from column T and the length from column L. The type information appears on output line 113. Line 113 is one binary value (for example 1) when the addressed value is of type R and is another binary value (for example 0) when the type is R'.

The R/R' information on line 113 is connected to the control 107. The L information from table 103 is input on line 119 to the runlength counter 105. Typically, the L information is a binary count and runlength counter 105 is parallel loaded with the binary count under control of line 114 from control 107.

If an R ESC or an R' ESC value is detected by detector 102, control 107 is signaled that no valid runlength will be derived from table 103. When control 107 senses that the ESC code has appeared in register 101, control 107 causes the content of the register 101 through gate 125 to be gated into the runlength counter 105. Thereafter, runlength counter 105 is decremented in the manner previously described.

Line 116 output from the table 103 is a validity bit indicating that a valid entry has been found in table 103. As each new code value bit is clocked into register 101, table 103 is addressed to determine if a valid entry is found. Not all input codes from register 101 will find a valid entry in table 103. All valid entries in table 103 provide a validity bit output on line 116 for signalling the control 107. When control 107 receives a valid bit from line 116, the length value for the addressed entry is stored into the runlength counter 105. Thereafter, the runlength counter 105 is decremented by the CLK<sub>5</sub> signal thereby counting out the runlength of zeros. Control line 118 inhibits any output from the amplitude table 104 whenever counter 105 is being decremented thereby loading zeros into the CO register 109. When the counter 105 has been counted down and the entire runlength of zeros has been loaded into register 109, control 107 has sensed the R or R' signal from line 113 and thereafter provides the following sequencing.

If line 113 indicated an R-type operation, then line 121 loads a 1 into the register 109 since R-type operations imply a 1 after a runlength of zeros. When line 121 writes a 1 into register 109, gate 108 is enabled by line 119 to load the sign bit, which will be the next bit in order clocked into register 101 into the register 109. Thereafter register 101 will be cleared and clocked to receive the next code bits.

If line 113 indicates an R'-type operation, then line 121 is not enabled and line 118 is enabled to read out an amplitude from amplitude table 104. Amplitude table 104 contains the information of TABLE 7 in inverse order. The inverse order indicates that table 104 is addressed by the information in the CODE column and provides an output on line 120 from the A column. Typically, the output value from the A column is a binary number representing the amplitude.

If an ESC value is called for, detector 102 signals control 107 to indicate that no valid amplitude will be obtained from table 104. When the A ESC code appears in the code register 101, the control 107 causes the next amplitude value in code register 101 to be gated directly via gate 108 to the CO register 109.

After an amplitude value is loaded into register 109 from table 104 or register 101, control 107 then signals via line 119 the loading of the sign bit from register 101 into register 109. Register 101 is then cleared to receive the next code value on line 117 from the buffer 53 of FIG. 1.

While FIG. 4 depicts one embodiment of a decoder in accordance with the present invention, many other software and hardware embodiments of the FIG. 5 decoder are possible.

Rate Buffer

The rate buffer 15 in FIG. 2 performs channel rate equalization. The buffer has a variable rate data input on lines 44 and a constant rate data output on lines 44. The differentials are monitored from frame to frame, and the status is converted into a scaling factor that is fed to the normalizer on lines 25. The buffer always forces the coder to adjust to the local coding variations, while ensuring global performance at a desired level.

Let B(n) represent the number of bits into the rate buffer for the nth frame and let S(n) represent the buffer status (difference between the read and write pointers of the FIFO) at the end of the nth frame. Then, B(n) and S(n) can be written as follows:

$$B(n) = K + N_1 + 12 N_2 + \dots \quad \text{Eq. (12)}$$

$$2N_3 + \sum_{i \in N_5} H(\{i(u,v)\}_i) +$$

$$11N_4 + \sum_{i \in N_4} H(\{i(u,v)\}_i) +$$

$$4N_5 + \sum_{i \in N_5} H(\{i(u,v)\}_i)$$

$$S(n) = S(n-1) + [B(n) - N^2 R] \quad \text{Eq. (13)}$$

where

- N<sub>1</sub> = number of blocks in replenishment mode
- N<sub>2</sub> = number of blocks in motion compensated replenishment mode
- N<sub>3</sub> = number of blocks in DPCM mode
- N<sub>4</sub> = number of blocks in motion compensated DPCM mode
- N<sub>5</sub> = number of blocks in intraframe mode
- {i(u,v)}<sub>i</sub> = normalized and quantized coefficient differences in ith block
- H(.) = "One's Redundancy" coding function R = average coding rate
- N = transform block size
- K = sync, header, and NF
- i ∈ N<sub>3</sub> = i belongs to N<sub>3</sub> DPCM block

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$i, N_4 = i$  belongs to  $N_4$  DPCM block

$i, N_5 = i$  belongs to  $N_5$  DPCM block

The buffer status  $S(n)$  is used to select an instantaneous scaling factor  $D^*(n)$  according to an empirically determined "scaling factor versus status" curve. This relationship is described by

$$D^*(n) = \Phi(S(n)) \quad \text{Eq. (14)}$$

In order to smooth out this instantaneous scaling factor such that the desired scaling factor does not fluctuate too much, a recursive filtering process is applied as follows:

$$D(n) = (1-c)D(n-1) + cD^*(n) \quad \text{Eq. (15)}$$

where  $c$  is a constant with value less than unity. The rate buffer can be guaranteed not to overflow by introducing a frame repetition mechanism. It can also be prevented from underflow by introducing fill bits.

#### Frame Repetition

The requirement of a frame repetition in the Motion Compensated Combined Interframe and Intraframe Coding System of FIG. 2 is well justified. Due to the usage of only one normalization factor per frame, an excessive amount of data can flow into the buffer during a scene cut or fast zooming operations. Only instantaneous shutting off of the input data like the frame repetition will prevent the rate buffer from overflowing. Also, in order to prevent the scaling factor from getting too large to introduce blocking artifacts, a frame repetition is desired.

To establish frame repetition in the rate buffer, a threshold in the rate buffer is first established. During the encoding process, if the data within the buffer exceeds this threshold at the end of the frame, frame repetition is initiated to stop the input data. The repetition process is stopped when the data within the buffer is reduced to a level lower than the threshold.

While the invention has been particularly shown and described with reference to preferred embodiments thereof, it will be understood by those skilled in the art that the foregoing and other changes in form and details may be made therein without departing from the spirit and scope of the invention.

What is claimed is:

1. A method for processing digital signals, where the digital signals have first values, second values and other values, to reduce the amount of data utilized to represent the digital signals and to form statistically coded signals such that the more frequently occurring values of digital signals are represented by shorter code lengths and the less frequently occurring values of digital signals are represented by longer code lengths, comprising,

forming first runlength code values representing the number of consecutive first values of said digital signals followed by said second value,

forming second runlength code values representing the number of consecutive first values of said digital signals followed by one of said other values.

2. The method of claim 1 further including the step of amplitude encoding said other values.

3. The method of claim 1 further including the step of encoding said first and second runlength code values with a sign value.

4. The method of claim 1 wherein said first values have amplitude zero, said second values have absolute amplitude one, and said other values have absolute

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amplitudes greater than one whereby said first and second runlength codes values are formed representing the number of consecutive zeros.

5. The method of claim 1 wherein said first values have the highest frequency of occurrence in said digital signals, wherein said second values have the next highest frequency of occurrence in said digital signals, and wherein said other values have the lowest frequency of occurrence in said digital signals.

6. A method for processing input signals to reduce the amount of data utilized to represent the input signals, the steps comprising,

processing the input signals to form processed signals where the processed signals are digital numbers having first values, second values, and other values,

coding each digital number to form statistically coded signals such that the more frequently occurring values in the digital numbers are represented by shorter code lengths and the less frequently occurring values of coded signals are represented by longer code lengths, said coding including,

forming first runlength code values representing the number of consecutive first values followed by said second value in a digital number,

forming second runlength code values representing the number of consecutive first values followed by one of said other values in the digital number.

7. The method of claim 6 wherein said coding step includes the step of amplitude encoding said other values.

8. The method of claim 6 wherein said coding step includes the step of encoding said first and second runlength code values with a sign value.

9. The method of claim 6 wherein said processing step forms said first values with amplitude zero, forms said second values with absolute amplitude one, and forms said other values with absolute amplitudes greater than one.

10. The method of claim 6 wherein a table is provided storing a plurality of runlength code values representing a plurality of different numbers of consecutive first values followed by said second value, and storing a plurality of second runlength code values representing a plurality of different numbers of consecutive first values followed by one of said other values, said first runlength code values and said second runlength code values statistically organized in said table such that the statistically more frequently occurring runlength code values are represented by shorter code lengths and the less frequently occurring values are represented by longer code lengths, and wherein

said step of forming first runlength code values is performed by table lookup from said table, said step of forming second runlength code values is performed by table lookup from said table.

11. The method of claim 6 wherein said coding step further includes the step of providing an end code to designate the end of a digital number.

12. A method for processing digital signals, where the digital signals have first values, second values and other values, where the processing reduces the amount of data utilized to represent the digital signals and where the processing forms statistically coded signals such that the more frequently occurring values of digital signals are represented by shorter code lengths and the

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less frequently occurring values of digital signals are represented by longer code lengths, comprising,

forming a first code value representing a set of said first values followed by said second value,

forming a second code value representing a set of said first values followed by one or more of said other values.

13. A method for processing digital signals to reduce the amount of data utilized to represent the digital signals, the steps comprising,

processing the digital signals to form processed signals where the processed signals are multivalued digital numbers and have first values, second values, . . . ,  $j$ -values,  $(j+1)$ -values, . . . ,  $n$ -values for  $j$  ranging from 1 to  $n$ , and have other values,

coding said processed signals to form statistically coded signals such that the more frequently occurring values of the processed signals are represented by shorter code lengths and the less frequently occurring values of coded signals are represented by longer code lengths, said coding including,

forming  $j^{\text{th}}$  runlength code values representing the number of consecutive processed signals of said first value followed by said  $j+1$  value, for each value of  $j$  from 1 to  $n$ ,

forming additional runlength code values representing the number of consecutive processed signals of said first value followed by any of said other values.

14. The method of claim 13 wherein said coding step includes the step of amplitude encoding said other values.

15. The method of claim 13 wherein said coding step includes the step of encoding said  $j$  runlength code values with a sign value.

16. The method of claim 13 wherein said processing step with  $n=2$  forms said first values with  $j=1$  equal to amplitude zero, forms said second values with  $j=2$  equal to absolute amplitude one, and forms said other values with absolute amplitudes greater than one.

17. The method of claim 13 wherein said processing step forms said first values with  $j=1$  equal to amplitude zero, forms said second values with  $j=2$  equal to absolute amplitude one, and forms third values with  $j=3$  equal to absolute amplitude two, and forms other values for  $n=3$  with absolute amplitude greater than 2.

18. The method of claim 6 wherein said processing step includes multiple modes of processing said digital signals to form said processed signals, and includes the step of selecting one of said modes based upon differences in said input signals.

19. The method of claim 6 wherein said input signals represent images and are presented in sequential frames, said processing step including multiple processing modes for processing said input signals to form said processed signals, and including the step of forming the mean-square difference,  $d_0$ , between input signals from the current frame and representations of input signals from the previous frame and includes the step of forming the mean-square error,  $d_b$ , between input signals from the present frame and the best matched representation of input signals from the previous frame; said processing step including the step of comparing the difference,  $d_0-d_b$ , with a motion threshold  $T_M$ , and selecting one of said modes based on said comparison.

20. The method of claim 19 including the step of determining when  $d_0-d_b$  is less than  $T_M$  and further including the step of selecting a non-motion-compensated replenishment mode when  $d_0$  is less than a predetermined threshold  $T_R$  and  $d_0-d_b$  is less than  $T_M$ .

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21. The method of claim 19 including the step of determining when  $d_0-d_b$  is less than  $T_M$  and further including the step of selecting a non-motion-compensated DPCM mode when  $d_b$  is less than a predetermined threshold  $T_{D/R}$  and  $d_0-d_b$  is less than  $T_M$ .

22. The method of claim 19 including the step of selecting an intraframe mode when  $d_0$  is greater than a predetermined threshold  $T_{D/I}$ .

23. The method of claim 19 including the step of determining when  $d_0-d_b$  is greater than  $T_M$  and further including the step of selecting a motion compensated replenishment mode when  $d_b$  is less than predetermined threshold  $T_{D/R}$  and  $d_0-d_b$  is greater than  $T_M$ .

24. The method of claim 19 including the step of determining when  $d_0-d_b$  is greater than  $T_M$  and further including the step of selecting a motion compensated DPCM mode whenever  $d_b$  is greater than a predetermined threshold  $T_{D/R}$  and  $d_0-d_b$  is greater than  $T_M$ .

25. An apparatus for processing digital signals, where the digital signals have first values, second values and other values, to reduce the amount of data utilized to represent the digital signals and to form statistically coded signals such that the more frequently occurring values of digital signals are represented by shorter code lengths and the less frequently occurring values of digital signals are represented by longer code lengths, comprising,

means for forming first runlength code values representing the number of consecutive first values of said digital signals followed by said second value, means for forming second runlength code values representing the number of consecutive first values of said digital signals followed by one of said other values.

26. The apparatus of claim 25 further including means for amplitude encoding said other values.

27. The apparatus of claim 25 further including means for encoding said first and second runlength code values with a sign value.

28. The apparatus of claim 25 wherein said first values have amplitude zero, said second values have absolute amplitude one, and said other values have absolute amplitudes greater than one whereby said first and second runlength codes values are formed representing the number of consecutive zeros.

29. The apparatus of claim 25 wherein said first values have the highest frequency of occurrence in said digital signals, wherein said second values have the next highest frequency of occurrence in said digital signals, and wherein said other values have the lowest frequency of occurrence in said digital signals.

30. An apparatus for processing input signals to reduce the amount of data utilized to represent the input signals, the apparatus comprising,

means for processing the input signals to form processed signals where the processed signals are digital numbers having first values, second values, and other values,

means for coding each digital number to form statistically coded signals such that the more frequently occurring values in the digital numbers are represented by shorter code lengths and the less frequently occurring values in the digital numbers are represented by longer code lengths, said means for coding including,

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means for forming first runlength code values representing the number of consecutive first values followed by said second value in a digital number,

means for forming second runlength code values representing the number of consecutive first values followed by one of said other values in the digital number.

31. The apparatus of claim 30 wherein said means for coding includes means for amplitude encoding said other values.

32. The apparatus of claim 30 wherein said means for coding includes means for encoding said first and second runlength code values with a sign value.

33. The apparatus of claim 30 wherein said means for processing forms said first values with amplitude zero, forms said second values with absolute amplitude one, and forms said other values with absolute amplitudes greater than one.

34. The apparatus of claim 30 including an addressable table storing runlength code values representing different numbers of consecutive first values followed by said second value, and storing a plurality of second runlength code values representing different numbers of said first values followed by one of said other values, said first runlength code values and said second runlength code values organized in said table such that the statistically more frequently occurring runlength code values in digital numbers are represented by shorter code lengths and the less frequently occurring values in digital numbers are represented by longer code lengths, and wherein

said means for forming first runlength code values includes means for addressing said addressable table with a runlength number representing the runlength of said first value followed by said second value in order to obtain said first runlength code value from said table, and

said means for forming second runlength code values includes means for addressing said addressable table with a runlength number representing the runlength of said first value followed by one of said other values in order to obtain said second runlength code value.

35. The apparatus of claim 30 wherein said means for coding further includes means for providing an end code to designate an end of a digital number.

36. An apparatus for processing digital signals to reduce the amount of data utilized to represent the digital signals, comprising,

means for processing the digital signals to form processed signals where the processed signals are multivalued digital numbers and have first values, second values, . . . ,  $j$ -values,  $(j+1)$ -values, . . . ,  $n$ -values for  $j$  ranging from 1 to  $n$ , and have other values, means for coding said processed signals to form statistically coded signals such that the more frequently occurring values in the digital numbers are represented by shorter code lengths and the less frequently occurring values in the digital numbers are represented by longer code lengths, said means for coding including,

means for forming  $j^{\text{th}}$  runlength code values representing the number of consecutive processed signals of said first value followed by said  $j+1$  value, for each value of  $j$  from 1 to  $n$ ,

means for forming additional runlength code values representing the number of consecutive pro-

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cessed signals of said first value followed by any of said other values.

37. The apparatus of claim 36 wherein said digital signals represent pixels forming images in sequential frames, said means for processing includes multiple mode processing means for processing said digital signals to form said processed signals, and includes means for forming the mean-square difference,  $d_0$ , between digital signals representing pixels of the current frame and digital signals representing pixels of the previous frame and includes means for forming the mean-square error,  $d_b$ , between the digital signals representing pixels in the present frame and digital signals representing the best matched pixels of the previous frame, said means for processing further including means for comparing the difference,  $d_0 - d_b$ , with a motion threshold  $T_M$ , and means for selecting one of said modes based on said comparison.

38. A method for processing digital signals, where the digital signals have first values, second values and other values, where the processing reduces the amount of data utilized to represent the digital signals and where the processing forms statistically coded signals such that the more frequently occurring values of digital signals are represented by shorter code lengths and the less frequently occurring values of digital signals are represented by longer code lengths, where

a first code value is formed representing a set of said first values followed by said second value,

a second code value is formed representing a set of said first values followed by one or more of said other values

comprising,

decoding said first code value to form a set of said first values followed by said second value,

decoding said second code value to form a set of said first values followed by one or more of said other values.

39. A method for processing digital signals to reduce the amount of data utilized to represent the digital signals, the steps comprising,

processing the digital signals to form processed signals where the processed signals are multivalued digital numbers and have first values, second values, . . . ,  $j$ -values,  $(j+1)$ -values, . . . ,  $n$ -values for  $j$  ranging from 1 to  $n$ , and have other values,

coding said processed signals to form statistically coded signals such that the more frequently occurring values of the processed signals are represented by shorter code lengths and the less frequently occurring values of coded signals are represented by longer code lengths, said coding including,

forming  $j^{\text{th}}$  runlength code values representing the number of consecutive processed signals of said first value followed by said  $j+1$  value, for each value of  $j$  from 1 to  $n$ ,

forming additional runlength code values representing the number of consecutive processed signals of said first value followed by any of said other values

transmitting said  $j^{\text{th}}$  runlength code values and said additional runlength code values to a receiver to form received signal including received  $j^{\text{th}}$  runlength code values and received additional runlength code values,

decoding said received signals to form decoded signals, said decoding including,

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decoding said received  $j^{th}$  runlength code values to form a number of consecutive decoded signals of said first value followed by said  $j+1$  value, for each value of  $j$  from 1 to  $n$ ,  
decoding said received additional runlength code values to form a number of consecutive decoded signals of said first value followed by any of said other values.

40. The method of claim 39 wherein said coding step includes the step of amplitude encoding said other values.

41. The method of claim 39 wherein said coding step includes the step of encoding said  $j$  runlength code values with a sign value.

42. An apparatus for processing input signals to reduce the amount of data utilized to represent the input signals, the apparatus comprising,

means for processing the input signals to form processed signals where the processed signals are digital numbers having first values, second values, and other values,

means for coding each digital number to form statistically coded signals such that the more frequently occurring values in the digital numbers are represented by shorter code lengths and the less frequently occurring values in the digital numbers are represented by longer code lengths, said means for coding including,

means for forming first runlength code values representing the number of consecutive first values followed by said second value in a digital number,

means for forming second runlength code values representing the number of consecutive first values followed by one of said other values in the digital number,

means for transmitting said  $j^{th}$  runlength code values and said additional runlength code values to a receiver to form received signal including received  $j^{th}$  runlength code values and received additional runlength code values,

means for decoding said received signals to form decoded signals, said means for decoding including,

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means for decoding said received  $j^{th}$  runlength code values to form a number of consecutive decoded signals of said first value followed by said  $j+1$  value, for each value of  $j$  from 1 to  $n$ .  
means for decoding said received additional runlength code values to form a number of consecutive decoded signals of said first value followed by any of said other values.

43. The apparatus of claim 42 wherein said means for coding includes means for amplitude encoding said other values.

44. The apparatus of claim 42 wherein said means for coding includes means for encoding said first and second runlength code values with a sign value.

45. The apparatus of claim 42 wherein said means for processing forms said first values with amplitude zero, forms said second values with absolute amplitude one, and forms said other values with absolute amplitudes greater than one.

46. The apparatus of claim 42 including an addressable table storing runlength code values representing different numbers of consecutive first values followed by said second value, and storing a plurality of second runlength code values representing different numbers of said first values followed by one of said other values, said first runlength code values and said second runlength code values organized in said table such that the statistically more frequently occurring runlength code values in digital numbers are represented by shorter code lengths and the less frequently occurring values in digital numbers are represented by longer code lengths, and wherein

said means for forming first runlength code values includes means for addressing said addressable table with a runlength number representing the runlength of said first value followed by said second value in order to obtain said first runlength code value from said table, and

said means for forming second runlength code values includes means for addressing said addressable table with a runlength number representing the runlength of said first value followed by one of said other values in order to obtain said second runlength code value.

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IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION

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Compression Labs, Incorporated, )  
)  
)  
*Plaintiff,* )  
)  
v. )  
)  
)  
1. Dell Incorporated, )  
2. International Business Machines )  
Corporation, )  
3. Toshiba America, Incorporated, )  
)  
)  
*Defendants.* )

BY \_\_\_\_\_

C.A. No. **2-04CV-159**

JURY

**COMPLAINT**

Compression Labs, Inc. ("CLI") for its Complaint against defendants Dell Incorporated, International Business Machines Corporation and Toshiba America, Incorporated alleges as follows:

**NATURE OF THE ACTION**

1. This is a patent infringement action to stop each Defendant's unauthorized and infringing sale, offers to sell, use and importation of products incorporating CLI's patented technology. CLI seeks injunctive relief to stop Defendants from continuing to infringe CLI's valuable patent rights, as well as monetary damages.

**THE PARTIES**

2. Plaintiff, CLI, is a corporation existing and organized under the laws of Delaware and has its principal place of business at 108 Wild Basin Drive, Austin, TX 78746.

3. Defendant Dell Incorporated is a corporation existing and organized under the laws of Delaware and has its principal place of business at 1 Dell Way, Round Rock, TX 78682.

4. Defendant International Business Machines Corporation is a corporation existing and organized under the laws of New York and has its principal place of business at New Orchard Road, Armonk, NY 10504.

5. Defendant Toshiba America, Incorporated is a corporation existing and organized under the laws of Delaware and has its principal place of business at 1251 Avenue of the Americas, 41<sup>st</sup> Floor, New York, NY 10020.

#### **JURISDICTION AND VENUE**

6. This action for patent infringement arises under the Patent Laws of the United States, 35 U.S.C. §§ 1 et seq., and in particular 35 U.S.C. §§ 271, 281, 283, 284 and 285. This Court has jurisdiction over the subject matter of this action under 28 U.S.C. 1338(a).

7. This Court has personal jurisdiction over each of the Defendants and venue is proper in this Court pursuant to 28 U.S.C. §§ 1391 and 1400.

#### **COUNT 1 – PATENT INFRINGEMENT**

8. This case involves technology used to process digital signals. CLI owns patents relating to such technology, and CLI invested substantial amounts in related research and development.

9. United States Patent No. 4,698,672 entitled “Coding System for Reducing Redundancy” (hereinafter “the ‘672 patent”), was duly and legally issued on October 6, 1987. CLI is an owner of the ‘672 patent and, pursuant to an agreement with its co-owner, has the exclusive rights to sue and recover for infringement thereof with respect to the Accused Devices, as hereinafter defined. A copy of the ‘672 patent is attached as Exhibit A.

10. Defendants offer to sell, sell, use, and/or import into the United States devices, at least portions of which are designed to be at least partly compliant with the JPEG standard as defined by CCITT Recommendation T.81 approved on September 18, 1992. entitled “Information Technology—Digital Compression and Coding of Continuous Tone Still Images—Requirements and Guidelines.” the identical text of which is also published as ISO/IEC International Standard 10918-1, or with any version or variance thereof defining a lossy

compression scheme (hereinafter referred to as "the Accused Devices"). The Accused Devices are covered by, and carry out methods that are covered by, one or more claims of the '672 patent.

11. Through their actions including offering to sell, selling, using and importing the Accused Devices, Defendants have infringed the aforementioned patent and actively induced others to infringe and contributed to the infringement by others of the '672 patent in the United States, including within the jurisdiction of this Court. Certain of the Defendants also have made the Accused Devices in the United States, and such Defendants have also infringed the aforementioned patent by their actions in this regard.

12. CLI is likely to be irreparably harmed by Defendants' infringement, inducement of others to infringe, and contributory infringement of the '672 patent. CLI has no adequate remedy at law.

WHEREFORE, CLI prays for judgment that:

A. United States Patent No. 4,698,672 has been infringed, directly, by inducement, and/or contributorily, by each Defendant;

B. Each Defendant, its officers, agents, servants and employees, and those persons in active concert and participation with any of them, be permanently enjoined from the direct or contributory infringement of, and from inducing others to infringe, United States Patent No. 4,698,672;

C. CLI be awarded damages sufficient to compensate it for each Defendant's infringement, contributory infringement and inducement of others to infringe, that such damages be increased to three times the amount found or assessed pursuant to 35 U.S.C. § 284, and that such damages be awarded to CLI with prejudgment interest;

D. That this case be declared exceptional pursuant to 35 U.S.C. § 284 and that CLI be awarded its attorney fees, costs and expenses in this action; and

E. CLI be awarded such other and further relief as the Court may deem just.



CLI DEMANDS A TRIAL BY JURY.

Respectfully submitted,

Compression Labs, Inc.

Dated: April 22, 2004

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# Exhibit A

**United States Patent** [19]  
 Chen et al.

[11] **Patent Number:** 4,698,672  
 [45] **Date of Patent:** Oct. 6, 1987

- [54] **CODING SYSTEM FOR REDUCING REDUNDANCY**
- [75] **Inventors:** Wea-hsiung Chen, Sunnyvale; Daniel J. Klenke, Milpitas, both of Calif.
- [73] **Assignee:** Compression Labs, Inc., San Jose, Calif.
- [21] **Appl. No.:** 923,630
- [22] **Filed:** Oct. 27, 1986
- [51] **Int. Cl.:** H04N 7/133; H04N 7/137
- [52] **U.S. Cl.:** 358/136; 358/261; 358/262; 375/27
- [58] **Field of Search:** 358/136, 135, 133, 261, 358/262; 375/27, 31, 33
- [56] **References Cited**

**U.S. PATENT DOCUMENTS**

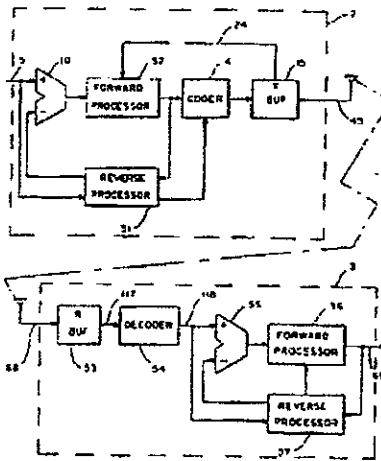
4,302,775	11/1981	Widergren	358/136
4,476,495	10/1984	Fujisawa	358/262
4,520,490	5/1985	Wei	375/27
4,538,370	12/1985	Mitchell	358/262
4,633,325	12/1986	Usubuchi	358/133

*Primary Examiner*—Howard W. Britton  
*Attorney, Agent, or Firm*—Fliesler, Dubb, Meyer & Lovejoy

[57] **ABSTRACT**

The present invention relates to methods and apparatus for processing signals to remove redundant information thereby making the signals more suitable for transfer through a limited-bandwidth medium. The present invention specifically relates to methods and apparatus useful in video compression systems. Typically, the system determines differences between the current input signals and the previous input signals using mean-square difference signals. These mean-square signals are processed and compared with one or more thresholds for determining one of several modes of operation. After processing in some mode, the processed signals are in the form of digital numbers and these digital numbers are coded, using ordered redundancy coding, and transmitted to a receiver.

46 Claims, 4 Drawing Figures



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Sheet 1 of 3

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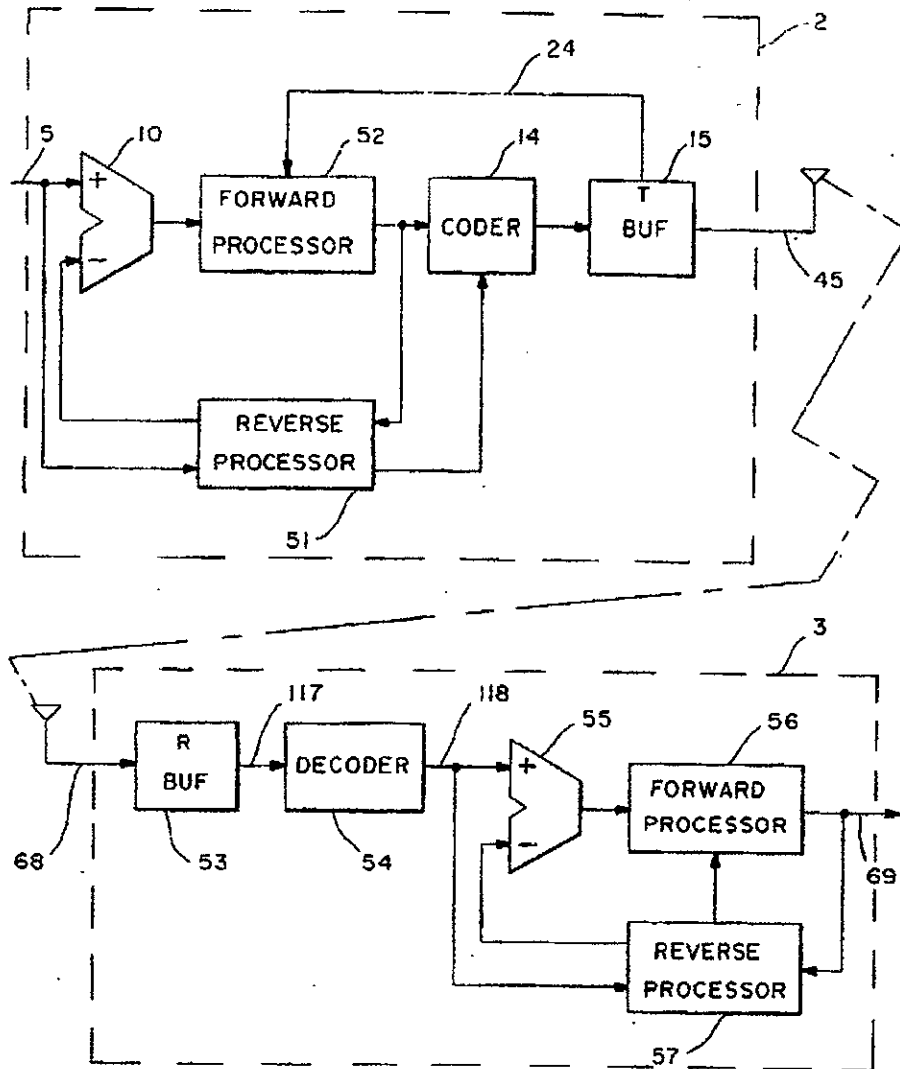


FIG. 1

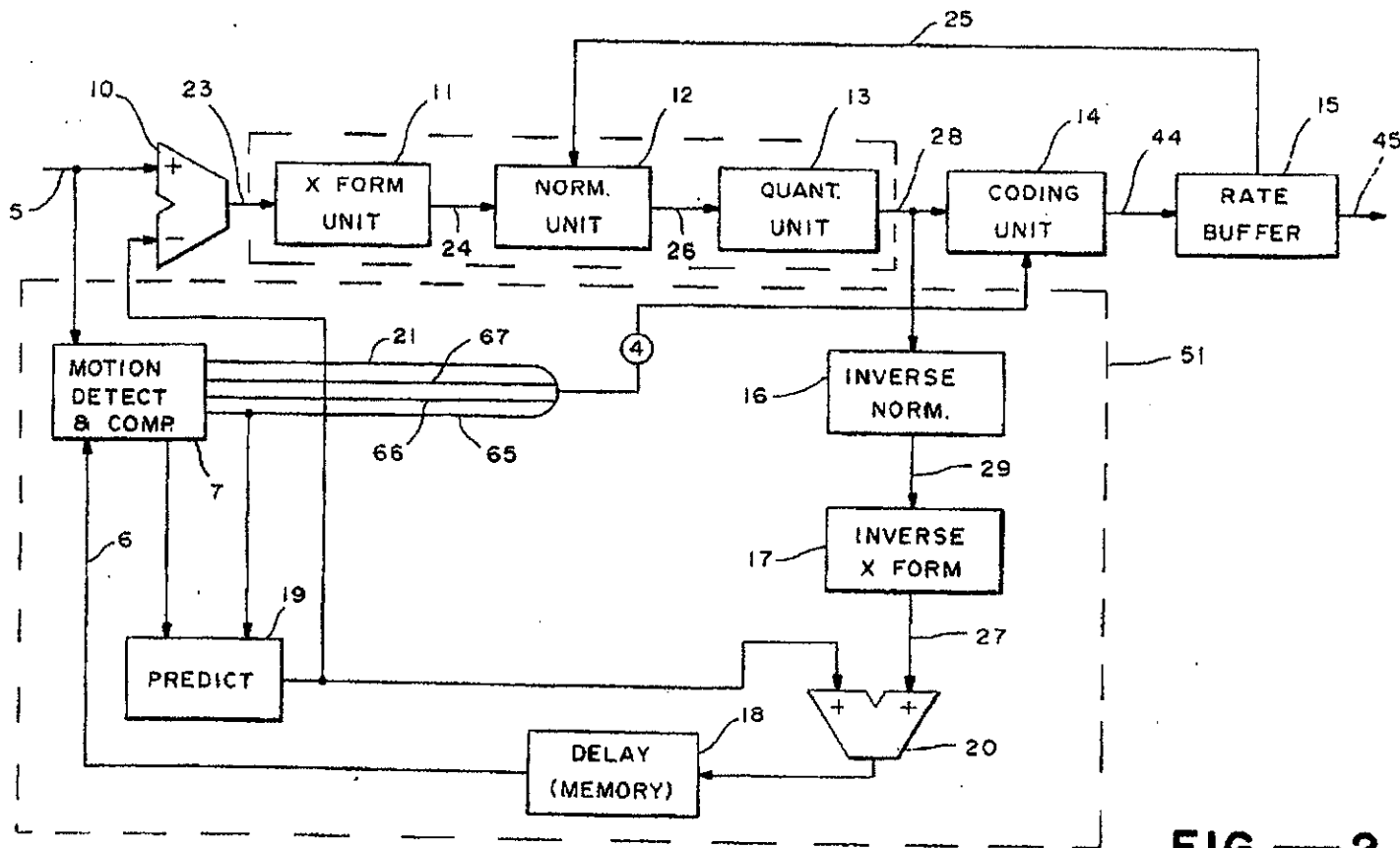


FIG.—2

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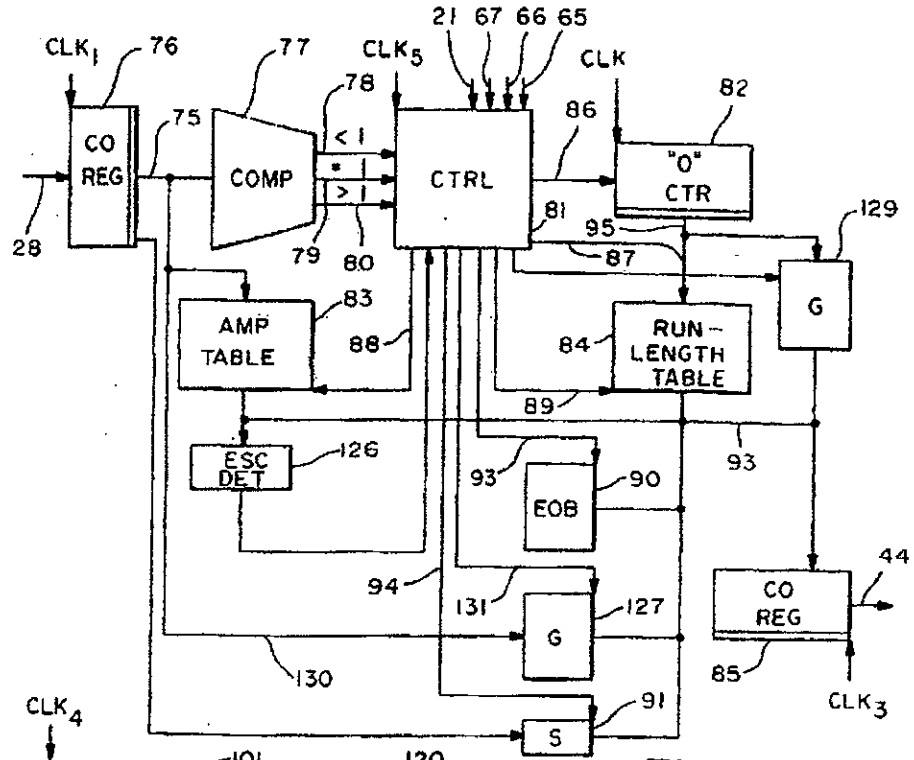


FIG.—3

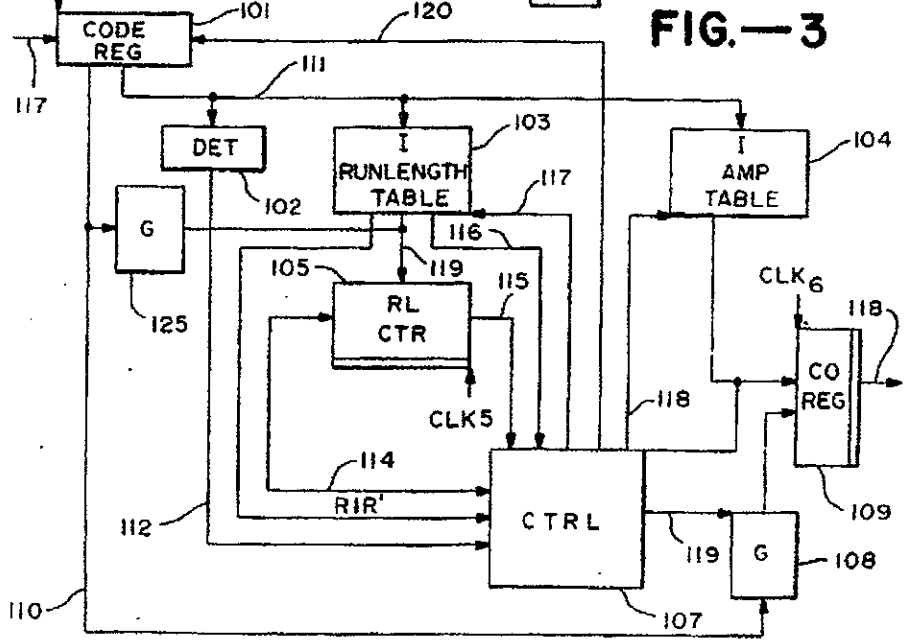


FIG.—4

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## CODING SYSTEM FOR REDUCING REDUNDANCY

### CROSS-REFERENCE TO RELATED APPLICATION

Title: A COMBINED INTRAFRAME AND INTER-  
FRAME TRANSFORM CODING SYSTEM

Ser. No.: 479,766 Filed: 83/03/28 (now abandoned)

Inventors: Wen-hsiung Chen, James Parker Elliott,  
Robert Edwin George Newell, Ralph Emerson Nich-  
ols, Albert Edwards Rackett

### BACKGROUND OF THE INVENTION

The present invention relates to methods and apparatus for processing signals to remove redundant information thereby making the signals more suitable for transfer through a limited-bandwidth medium. The present invention specifically relates to methods and apparatus useful in video compression systems.

Many signal processing techniques useful in video compression systems are known. For example, digital encoding is often employed in processing television signals which are to be transferred over transmission channels since digital data streams are more immune to noise degradation.

In order to digitally encode a television signal, a significant number of bits, 4 or more, may be required to provide for an acceptable range of gray scale for each of the hundreds of thousands of separate picture elements (pixels) which form an image. Consequently, data rates for unprocessed digitalized television signals typically require a bandwidth greater than 40 megabits per second. If the communications link is an earth satellite, an unprocessed video signal typically occupies nearly the entire bandwidth of the satellite, with very few channels, if any, left over for other uses. A T1 communication channel is typical and has only a 1.5 megabit per second bandwidth. A practical yet effective way to reduce the bandwidth of digitalized television signals is needed so that fewer channels are required for transmission over a communications path and so that the quality of transmitted signals is maintained even when reduced bandwidth transmission is employed.

U.S. Pat. No. 4,302,775, assigned to the same assignee as the present invention, describes a scene adaptive coding technique which eliminates redundant information and thereby reduces the bandwidth.

The patent describes a single-pass digital video compression system which implements a two-dimensional cosine transform with intraframe block-to-block comparisons of transform coefficients without need for preliminary statistical matching or preprocessing.

Each frame of the video image is divided into a predetermined matrix of spatial subframes or blocks. The system performs a spatial domain to transform domain transformation of the picture elements of each block to provide transform coefficients for each block. The system adaptively normalizes the transform coefficients so that the system generates data at a rate determined adaptively as a function of the fullness of a transmitter buffer. The transform coefficient data thus produced is encoded in accordance with amplitude Huffman codes and zero-coefficient runlength Huffman codes which are stored asynchronously in the transmitter buffer. The encoded data is output from the buffer at a synchronous rate for transmission through a limited-bandwidth medium. The system determines the buffer fullness and

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adaptively controls the rate at which data is generated so that the buffer is never completely emptied and never completely filled.

In the system receiver, the transmitted data is stored in a receiver buffer at the synchronous data rate of the limited-bandwidth medium. The data is then output from the receiver buffer asynchronously and is decoded in accordance with an inverse of the encoding in the transmitter. The decoded data is inversely normalized and inversely transformed to provide a representation of the original video image.

The U.S. Pat. No. 4,302,775 patents reduces redundancy by employing intraframe coding techniques utilizing intraframe comparisons of cosine transform coefficients. While the patent provides significant improvement over other techniques, there is a need for even greater compression.

In addition to intraframe coding techniques, interframe coding techniques have been used to reduce the rate required for video transmission as described, for example, in the above-identified application. Typically, each video frame is held in memory at both the transmitter and the receiver and only frame-to-frame changes are transmitted over the communication link. In contrast to intraframe coding schemes in which the quality of coded images is dependent upon the amount of detail in each single image frame, the quality of the coded image in interframe coding is dependent upon the differences from frame to frame. Frame-to-frame differences are often referred to as "motion".

Interframe coding techniques are broadly classified into two categories, namely, spatial domain coding and transform domain coding. In real-time interframe spatial-domain coding systems, spatial domain data can be threshold processed to obtain and store frame difference signals in a transmitter buffer. The threshold value can be adaptively determined as a function of the transmitter buffer fullness. In order to eliminate the image breakdown, both spatial and temporal subsampling has been proposed.

The above-identified U.S. patent application entitled "A Combined Intraframe and Interframe Transform Coding System" employs intraframe and interframe variable prediction transform coding. Images are represented by sequential frames of two-dimensional arrays of digital signals. The digital signals are transformed to form transform coefficients for each frame. Predicted transform coefficients are formed using sets of variable prediction factors. The predicted transform coefficients for each frame are compared with corresponding actual transform coefficients for the frame to form transform coefficient difference signals. The difference signals are processed to control their range of values. The processed difference signals are statistically coded such that the more frequently occurring values are represented by shorter code lengths and the less frequently occurring values are represented by longer code lengths. The coded signals are stored in a buffer memory for transmission. The coded signals in the buffer memory are transmitted, over a limited-bandwidth medium, to the receiver along with processing information. The processing information includes codes identifying the set of variable prediction factors utilized in the transmitter. The same set of variable prediction factors is utilized in the receiver to reconstruct predicted transform coefficients which in turn are used to reconstruct representations of the original images in the transmitter.

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The extension of the Scene Adaptive Coding of U.S. Pat. No. 4,302,775 from intraframe coding to interframe coding has proven very significant in terms of improving image quality and reducing bandwidth. These improvements, however, have created a need for improved coding systems for reducing redundancy and there continues to be a need for improved signal processing methods and apparatus for data compression systems.

### SUMMARY OF THE INVENTION

The present invention is a signal processor and method for efficiently processing signals using ordered redundancy (OR) coding and any one of a number of different modes.

The signals to be coded are typically multiple values where the multivalued digital numbers,  $X(k)$  are typically the integers 0, 1, 2, 3, 4, . . . , and so on arranged in any order. Frequently, some values are repeated in forming digital numbers and hence the probable frequency of occurrence of some values is different than for other values. In one example of digital numbers, the highest frequency of occurrence is the value 0, the next highest frequency of occurrence is the value 1 and the other values greater than 1 (namely 2, 3, 4, 5, and so on) occur least frequently. With such order to the frequency of occurrence of values to be coded, the ordered redundancy coding of the present invention is most efficient.

Using ordered redundancy coding, the system codes the highest most frequently occurring values (0's in the usual example) using runlength coding. In the most preferable example, the runlength encoding is of two types, R and R'. The first type, R, is utilized when a runlength of consecutive zeros (0's) is followed by the next most frequently occurring value (1 in the usual case) and the other type, R', is utilized when the runlength of consecutive zeros (0's) is followed by some other value, one of the least frequently occurring values (usually greater than 1 such as 2, 3, and so on). Whenever the second type, R', of runlength coding is employed, the runlength code is typically followed by an amplitude code which explicitly encodes the actual amplitude (2, 3, . . . ) of the following other value. Whenever the first type, R, of runlength coding is employed, no coding of the second value (usually 1) is required because an amplitude of 1 is implied simply by the use of the first type, R, of runlength coding.

The ordered redundancy coding of the present invention is typically utilized in a system that processes input signals, such as spatial domain image signals occurring in successive frames, to form processed signals for each frame. Any number of different processing modes are possible. The processed signals are in the form of a plurality of multivalued digital numbers,  $X(k)$ , typically one number,  $X(k)$ , for each frame.

In one particular embodiment, the processing modes include two replenishment modes (one with motion compensation and one without), two DPCM modes (one with motion compensation and one without) and one intraframe mode. The decision as to which mode to select is made based upon an analysis of the frame-to-frame differences (motion) between the current input signals and the previous input signals.

Typically, the system determines differences between the current input signals and the previous input signals using mean-square difference signals. These mean-square signals are processed and compared with one or

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more thresholds for determining one of several modes of operation. After processing in some mode, the processed signals are in the form of digital numbers and these digital numbers are coded, using ordered redundancy coding, and transmitted to a receiver.

After transmission of the coded signals, the received signals are decoded and processed in reverse of the particular one of the modes by which the signals were processed in the transmitter.

In accordance with the above summary, the present invention achieves the objective of providing an improved signal processor for reducing redundancy using ordered redundancy coding.

The foregoing and other objects, features and advantages of the invention will be apparent from the following detailed description in conjunction with the drawings.

### BRIEF DESCRIPTION OF THE DRAWINGS

FIG. 1 depicts a block diagram of a transmitter and receiver system.

FIG. 2 depicts further details of the transmitter of the FIG. 1 system.

FIG. 3 depicts further details of the coder used in the FIG. 2 transmitter.

FIG. 4 depicts further details of the decoder used in the receiver.

### DETAILED DESCRIPTION

#### Overall System—FIG. 1

In FIG. 1, a block diagram of a transmitter and a receiver in accordance with the present invention is shown. Digital signals to be processed are input on lines 5 to the transmitter 2. The input signals on lines 5 are processed in one of a number of different modes so as to efficiently compress the data input signals to form processed signals for transmission to a receiver. The processed signals are coded and output on lines 45 from the transmitter 2 and are transmitted to the receiver 3.

The transmitter 2 includes a forward processor 52 and a feedback (reverse) processor 51. Typically, the input signals on lines 5 represent images and are presented in the space domain as frames in accordance with well known techniques. The forward processor 52 typically processes the spatial domain input signals to form processed signals which typically are transform domain signals arranged in blocks of transform domain coefficients. The forward processor 52 processes the current input signals from the most current frame.

The reverse processor 51 typically inverse processes signals from transform domain to spatial domain. Processor 51 stores signals representing the previous frame of data and also receives the current input signals so as to enable a comparison to be made between the previous inverse processed input signals and the current input signals. When the current input signals have been transformed from the spatial domain to the transform domain, the reverse processor performs an inverse transform to convert the transform domain signals back to spatial domain signals and stores those spatial domain signals for comparison with the current input spatial domain signals.

The reverse processor 51 determines changes between the current signals and the previous signals. Typically, these differences are determined using mean-square signals,  $d_0$  and  $d_b$ , hereinafter defined. These mean-square signals are processed and compared with



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one or more thresholds for determining one of several modes of operation for the system of FIG. 1.

Any number of different modes are possible. In one particular embodiment, two replenishment modes (one with motion compensation and one without), two DPCM modes (one with motion compensation and one without) and one intraframe mode are employed. The decision as to which mode to select is made based upon an analysis of the frame-to-frame differences (motion) of the input data. After the processing by the processor 52 and the processor 51, the processed signals are input to the coder 14.

The coder 14 encodes the processed signals using statistical frequency coding. With statistical frequency coding, signals with a statistically higher frequency of occurrence are encoded with a shorter code length than signals with a statistically lower frequency of occurrence. Additionally, the coder 14 utilizes a novel ordered redundancy (OR) coding technique. In the ordered redundancy coding, the processed signals to be coded have multiple values. For example, values are typically 0, 1, 2, 3, 4, . . . , and so on. Typically, the statistical frequencies of the values to be coded have an order. Particularly, that order is based upon the probable frequency of occurrence of the different values. The highest frequency of occurrence is typically the value 0, the next most frequently occurring value is 1 and the other values greater than 1 (2, 3, 4, 5, and so on) occur least frequently. With such order to the signals to be coded, the ordered redundancy coding of the present invention is most efficient.

Using OR coding, the coder 14 of FIG. 1 codes the highest most frequently occurring values (0's in the usual example) using runlength coding. In the most preferable example, the runlength encoding is of two types, R and R'. The first type, R, is utilized when the runlength of 0's is followed by the next most frequently occurring value (1 in the usual case) and the other type, R', is employed when the runlength of 0's is followed by some other value of the least frequently occurring type (usually greater than 1 such as 2, 3, and so on). Whenever the R' type of runlength coding is employed, the runlength code is typically followed by an amplitude code which explicitly encodes the actual amplitude of the other value. Whenever the first type, R, of runlength coding is employed, no coding of the second value (usually 1) is required because an amplitude of 1 is implied simply by the use of the first type, R, of runlength coding.

After the ordered redundancy coding in coder 14, data is transferred to the transmitter buffer 15. The buffer 15 provides a feedback signal on line 25 to control the forward processor 52 data rate.

In FIG. 1, the data from line 45 is input on line 68 after transmission over some conventional transmission medium to the receiver 3. In the receiver 3, a receiver buffer 53 stores the received data. A decoder 54 decodes the received data. Thereafter, the decoded data is processed in reverse of the particular one of the modes by which the data was processed in the transmitter 2. The reconstituted data appears on output line 69.

Transmitter—FIG. 2

FIG. 2 is a block diagram of a transmitter for motion compensated combined interframe and intraframe coding system of FIG. 1. Motion compensation is incorporated into a combined interframe and intraframe coding system using the spatial pixels in the inverse loop 9. In operation, the original spatial image on input lines 5 is

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compared to the reconstructed spatial image on lines 6 of the previous frame on a block-by-block basis through a motion detector 7. The reconstructed spatial image is obtained from the memory 18 of the feedback DPCM loop 9.

The feedback loop 9 includes the inverse normalizer 16, inverse transformer 17, the sum unit 20, the delay (memory) 18, the prediction unit 19, and the motion detector and compensator 7. If the motion detector 7 determines that there is little difference between the blocks, a "replenishment mode" is selected. On the other hand, if enough difference is detected, the block in the current frame is compared to the neighborhood of the corresponding reconstructed block in the previous frame to find the best match of the block. For the purpose of increasing the system performance a sub-pixel match is employed. If the difference between the current block and its best matched block does not result in a reasonable improvement over the difference between the current block and its original counterpart, a motion compensation is not justified. In this case, a "DPCM mode" with variable predictions is selected to handle the block difference. On the other hand, if the difference between the current block and its best matched block is reasonably smaller than the difference between the current block and its original counterpart, a motion compensation is initiated. In this case, the difference between the current block and its best matched block is screened to determine if the block belongs to a "motion compensated replenishment" block or a "motion compensated DPCM" block. The forward loop of the DPCM system encodes the "DPCM" or "motion compensated DPCM" data in the transform domain. Statistical frequency coding is employed to improve the efficiency. The feedback loop of the DPCM system is operated in the spatial domain with variable predictions.

Motion Detection and Compensation

The motion detection serves two purposes. It compares the block pixels in the present frame to the neighborhood pixels of the corresponding block in the previous frame to find the sub-pixel displacement of the block that gives the best match. It also tracks the displacement vectors and the degree of differences during the matching process for a subsequent modification of the DPCM frame memory and controlling of the predictor parameters in the feedback DPCM loop. Three basic types of modes (replenishment modes, intraframe mode, and DPCM modes) are determined from the motion detection. A decision process among the modes is employed. The decision process relies in part on a determination as to whether motion-compensation or non-motion-compensation is to be employed. Motion compensation is determined using the mean-square difference,  $d_0$ , and the mean square error,  $d_b$ .

The mean-square difference,  $d_0$ , is formed as follows:

$$d_0 = (1/N^2) \sum_{j=0}^{N-1} \sum_{k=0}^{N-1} [f(j,k) - \hat{f}(j,k)]^2 \quad \text{Eq. (1)}$$

where  $f(j,k)$  are spatial pixels (on lines 5 of FIG. 2) of the current frame and  $\hat{f}(j,k)$  are the corresponding pixels (on line 6 of FIG. 2) of the reconstructed previous frame. N is the transform block size.

The mean-square error,  $d_b$ , is formed as follows:

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$$d_b = (1/N^2) \sum_{j=0}^{N-1} \sum_{k=0}^{N-1} [f(j,k) - \bar{f} + \Delta_j k + \Delta_k]^2 \quad \text{Eq. (2)}$$

where  $f(j,k)$  are the block pixels in the present frame and  $f(j+\Delta_j, k+\Delta_k)$  are the best matched pixels in the previously reconstructed frame where  $\Delta_j, \Delta_k$  are the displacement (vector) for the best match.

#### Replenishment Modes

The replenishment modes are either motion-compensated or non-motion-compensated. The decision process selects compensation or non-compensation based upon motion detection. The motion detection unit 7 of FIG. 2 determines the difference between the incoming spatial pixels of a block and the reconstructed spatial pixels of the corresponding block in the previous frame. If the motion detection process determines that there is little frame-to-frame difference between corresponding blocks, a non-motion-compensated replenishment mode is selected and a code word is sent on line 21 from unit 7 of FIG. 2 to the encoder 14 to identify the mode.

If the motion detection process determines that the frame-to-frame block difference is great enough then, under some circumstances, a motion-compensated replenishment mode is selected. The detection process typically uses the mean-square difference,  $d_b$ , and compares it to a predetermined non-motion-compensated replenishment threshold,  $T_R$ . This process is written as follows:

if  $(d_0 - d_b) < T_M$  and  $d_0 < T_R$ , select non-motion-compensated replenishment mode.

The detection process compares the mean square error,  $d_b$ , with a predetermined motion-compensated replenishment threshold,  $T_{D/R}$ , as follows:

if  $(d_0 - d_b) > T_M$  and  $d_b < T_{D/R}$ , select motion-compensated replenishment mode.

The identification code words for the replenishment modes are typically Huffman coded. Typically, a one-bit code (0), on line 21 of FIG. 2 is used if the non-motion-compensated replenishment mode appears most frequently statistically. Once this code word is identified at the receiver, the reconstructed block pixels in the previous frame are repeated to form the present block in the receiver.

For the motion compensated replenishment block, typically a four-bit code (1111) is used, along with the displacement vector representing the best match, and appears on line 67 in FIG. 2. At the receiver, the vector uses the compensated block pixels from the reconstructed previous frame to form the presently reconstructed block.

#### DPCM Modes

The DPCM modes are either non-motion-compensated or motion-compensated. Selection of the compensation or non-compensation DPCM modes is dependant in part on motion detection. The motion detection searches for the best matched block pixels from the reconstructed previous frame. The difference,  $d_b$ , between the present block pixels and the best matched block pixels is then computed. If this difference is smaller than the motion threshold,  $T_M$ , no motion compensation is justified due to the necessity of sending the displacement vector as coding overhead. In this case, the difference,  $d_0$ , is compared to a DPCM threshold,  $T_{D/B}$ , to determine if the block belongs to a DPCM mode. The decision process is given as follows:

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if  $(d_0 - d_b) < T_M$  and  $d_0 < T_{D/B}$ , select non-motion-compensated DPCM mode.

If a non-motion-compensated DPCM mode is selected, the predictor in the feedback loop is enabled and the difference is sent to the discrete cosine transformer for subsequent encoding. Again, the mode identification is Huffman coded. Typically, a two-bit code (10) used for the non-motion-compensated DPCM mode and appears on line 66 in FIG. 2.

At the receiver, the DPCM data are inversely transformed and added onto the block pixels from the reconstructed previous frame to form the present block pixels.

For the motion-compensated DPCM mode, the difference,  $d_b$ , between the current block pixels and the best matched block pixels is compared to a predetermined motion-compensated replenishment threshold,  $T_{D/R}$ . If  $d_b$  is larger than the threshold, a motion-compensated DPCM mode is selected to handle the pixel differences.

The decision process is given as follows:

If  $(d_0 - d_b) > T_M$  and  $d_b > T_{D/R}$ , select motion-compensated DPCM mode.

For the motion compensated DPCM blocks, typically a three-bit code (110) is used together with the displacement vector representing the best match of the block along with the motion compensated DPCM data (transform coefficient differences between the present block and the best matched block from the reconstructed previous frame). The mode ID and vector appear on line 65 in FIG. 2. At the receiver, these DPCM data are inverse transformed and added onto the compensated block pixels from the reconstructed previous frame to form the present block pixels.

#### Intraframe Mode

The intraframe mode is selected when neither the motion-compensated mode nor the DPCM mode is justified. The difference,  $d_0$ , between the current block pixels and the reconstructed previous block pixels is compared with the predetermined DPCM threshold,  $T_{D/B}$ . The decision process is as follows:

If  $(d_0 - d_b) < T_M$  and  $d_0 > T_{D/B}$ , select intraframe mode.

If the intraframe mode is selected, the predictor is disabled and the current block pixels are sent to the transformer with unit 11 of FIG. 2. Typically, a four-bit code (1110) appearing on line 66 in FIG. 2 is used to identify the "intraframe mode". The intraframe data in the receiver are inversely transformed to form the present block pixels.

#### Compensation Range and Resolution

The performance of the motion compensated system is dependent upon the range and resolution of the matching process. The larger the range and the finer the resolution, the better the system performs. However, due to the necessity of encoding the vector information as system overhead, the range and resolution of the searching process is somewhat limited.

#### Searching Algorithm

The search for the best matched position is a very time consuming process. As one example, a simple binary search algorithm for a maximum range of 1.75 can be employed. Using such an algorithm, the nine whole-pixel positions centered around the position of the present block are first examined to find the best match. Next, the eight half-pixel neighborhood positions centered around the best matched whole-pixel position are examined. The process continues until the best matched quarter-pixel position is located. The horizontal and

vertical addresses of this location are then recorded as a vector and encoded accordingly. The number of steps required for a binary search is many times lower than that of a brute force search.

Subpixel translation is done by performing bilinear interpolation taking weighted averages of the four nearest values at integral pixel positions surrounding the subpixel location. The weighting factors that are used are linear functions of the horizontal and vertical distance of the fractional displacement from the integral pixel positions. As an example, a displacement of 1.25 horizontally, and 0.75 vertically is performed as follows:

$$f(u+1.25, v+0.75) = w_1 f(j+1, k) + w_2 f(j+1, k-1) + w_3 f(j+2, k) + w_4 f(j+2, k-1) \quad \text{Eq. (3)}$$

where  $w_1 = (0.75)(0.25)$ ,  $w_2 = (0.75)(0.75)$ ,  $w_3 = (0.25)(0.25)$ , and  $w_4 = (0.25)(0.75)$

DPCM Loop

Referring to FIG. 2, the Differential Pulse Code Modulated (DPCM) loop consists of a cosine transform unit 11, a normalization unit 12, a quantization unit 13, an inverse normalization unit 16, an inverse transform unit 17, a delay memory 18, and a prediction unit 19. In operation, an input pixel block on lines 5 from the present frame is first subtracted in subtractor 10 by its estimation from the previous frame on line 23 on a pixel-by-pixel basis to generate block differences. These differences are then cosine transformed in transform unit 11 to form the coefficient differences on lines 24. The coefficient differences are next scaled in normalizer unit 12 according to a feedback parameter on lines 25 from the output rate buffer 15. The scaled coefficient difference on lines 26 are then quantized in unit 13 and fed into both the coder unit 14 and the inverse DPCM loop 9. In the inverse DPCM loop 9, the quantized and scaled data are inversely normalized in unit 16 and inversely transformed in unit 17, to form the quantized coefficient differences on lines 27. These differences are then added in adder 20 to the motion compensated estimation on lines 3 to form the reconstructed pixel block in the frame memory 18. After a single-frame delay, in memory 18, the motion detector 7 uses the motion compensated block from the memory 18, multiplies it by a prediction weighting factor, and is ready for the next frame of operation. At the receiver, the received data follows the inverse DPCM loop to reconstruct the spatial pixels in the output block.

Cosine Transform

The coefficient differences between the input pixels from the present frame on lines 5 and the estimations from the previously reconstructed frame on lines 3 are formed by the difference circuit 10 on lines 23 and are expressed as follows:

$$e_n(j, k) = f_n(j, k) - p(j, k) \quad \text{Eq. (4)}$$

where  $\Delta j$  and  $\Delta k$  represent the vector values for the best match determined by the motion detector and where  $p(j, k)$  represents the estimation. These differences within a  $N \times N$  block are cosine transformed in transformer 11 to form the coefficient differences on lines 24. The cosine transform is defined as follows:

$$E_n(u, v) = 4[C(u)C(v)]/N^2 \sum_{j=0}^{N-1} \sum_{k=0}^{N-1} e_n(j, k) \quad \text{Eq. (5)}$$

-continued

$$\begin{aligned} & \cos[(2j+1)u\pi/2N] \cos[(2k+1)v\pi/2N] \\ & \text{for } u, v = 0, 1, \dots, N-1 \\ C(w) &= 1/(2^w) \text{ for } w = 0 \\ &= 1 \text{ for } w = 1, 2, \dots, N-1 \end{aligned}$$

where  $w = u$  or  $v$  where  $(j, k)$  and  $(u, v)$  represent indices in the horizontal and vertical directions for the pixel difference and coefficient difference blocks, respectively, and where  $C(w)$  represents  $C(u)$  or  $C(v)$ . The cosine transform restructures the spatial domain data into the coefficient domain such that it will be beneficial to the subsequent coding and redundancy removal processes.

Normalization

The coefficient differences,  $E_n(u, v)$ , are scaled according to a feedback normalization factor,  $D$ , on lines 25, from the output rate buffer 15 according to the relation,

$$I_n(u, v) = E_n(u, v)/D \quad \text{Eq. (6)}$$

The scaling process adjusts the range of the coefficient differences such that a desired number of code bits can be used during the coding process.

Quantization

The quantization process in unit 13 is any conventional linear or non-linear quantization. The quantization process will set some of the differences to zeros and leave a limited number of significant other differences to be coded. The quantized coefficient differences on lines 28 are represented as follows:

$$\tilde{I}_n(u, v) = Q[I_n(u, v)] \quad \text{Eq. (7)}$$

where  $Q[\ ]$  is a quantization function.

It should be noted that a lower bound is determined for the normalization factor in order to introduce meaningful coefficient differences to the coder. Generally speaking, setting the minimum value of  $D$  to one is sufficient for a low rate compression applications involving transform blocks of 16 by 16 pixels. In this case the worst mean square quantization error is less than 0.083. This mean square error corresponds to a peak signal-to-quantization-noise ratio of 40.86 db which is relatively insignificant for low rate applications.

Inverse Normalization

The process of inverse normalization in unit 16 produces the quantized coefficient differences on lines 29 in the inverse DPCM loop 9. This process is represented as follows:

$$\bar{E}_n(u, v) = \tilde{I}_n(u, v)D \quad \text{Eq. (8)}$$

Inverse Cosine Transform

The inverse cosine transform process in unit 17 in the inverse DPCM loop 9 converts the quantized coefficient differences on lines 29 back to the spatial domain pixel differences on lines 27. This process is defined as follows:

$$\hat{e}_n(j, k) = \sum_{u=0}^{N-1} \sum_{v=0}^{N-1} C(u)C(v) \bar{E}_n(u, v) \quad \text{Eq. (9)}$$

$$\begin{aligned} & \cos[(2j+1)u\pi/2N] \cos[(2k+1)v\pi/2N] \\ & \text{for } j, k = 0, 1, \dots, N-1. \end{aligned}$$

Frame Memory

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The frame memory 18 contains the reconstructed input pixels in the inverse DPCM loop. The quantized pixel differences from the inverse cosine transformer on lines 27 and the motion compensated estimations from the previously reconstructed frame on lines 3 are added together in adder 20 to form the reconstructed pixels,  $\hat{f}_n(j,k)$ , which replace the block pixels in the memory 18. This process is represented as follows:

$$\hat{f}_n(j,k) = \hat{z}_n(j,k) + \rho(j,k)\hat{f}_{n-1}(j + \Delta j, k + \Delta k) \quad \text{Eq. (10)}$$

**Prediction**

The prediction process in unit 19 finds an estimation of a datum from its surrounding data. By way of example for a simple predictor that uses the previous frame as a base for the estimation, the estimated value is termed as the correlation coefficient,  $\rho(j,k)$ , given as follows:

$$\rho(j,k) = E\{e_n(j,k)e_{n-1}(j + \Delta j, k + \Delta k)\} / \sigma^2(j,k) \quad \text{Eq. (11)}$$

where E represents expected value and  $\sigma^2(j,k)$  represents the variance of  $e_n(j,k)$ . The correlation coefficient, termed as leak factor, ranges from 0 to 1 depending on the frame-to-frame pixel differences. The value is very close to 1 for a limited motion sequence. However, during a scene cut or a rapid zooming sequence, the value is way below the value of 1. Because different leak factors have to be identified in the encoding of the DPCM process, it represents a significant overhead for the low rate system if too many values are to be identified. In one embodiment, only two leak factor values are used for the five-mode motion detection system: 1 for the non-motion-compensated DPCM and motion compensated DPCM modes and 0 for the intraframe mode.

**Coding**

In order to minimize overhead code bits, in one typical example the encoding process in unit 14 for the FIG. 2 system is performed on a frame by frame bases. The coded bit stream includes sync, header, scaling factor (NF), and variable-length data as follows:

TABLE 1

			variable
SYNC	HEADER	NF	DATA

In the header, at least one bit is reserved for the identification of full motion and graphic operations. The data portion includes the block-to-block mode identifiers, the vector values, DPCM and intraframe data. The bit allocations are dependent upon each individual block which is illustrated in TABLE 2.

TABLE 2

1			
MODE			
Replenishment Block			
4		8	
MODE		VECTOR	
Replenishment of Motion Compensated Block			
2		variable	
MODE		DPCM	
		EOB	
DPCM of Non-motion Compensated Block			
4		variable	
MODE		INTRAFRAME	
		EOB	
Intraframe of Non-motion Compensated Block			

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TABLE 2-continued

J		8		variable	
MODE		VECTOR		DPCM	EOB
DPCM of Motion Compensated Block					

**DPCM Encoding**

The Scene Adaptive Coding (SAC) is very efficient in terms of coding the intraframe transform coefficients. When this scheme is applied to a coding system involving intraframe, interframe and motion compensation, the coding efficiency is somewhat reduced due to the structure of coefficient differences or motion compensated coefficient differences caused by the additional removal of redundancies. One observation that can be made in the motion compensated coefficient differences (non-zero after normalization and quantization) and, to a certain degree, the interframe coefficient differences (non-zero differences) is that most of these differences are sparsely distributed with an overwhelming majority of them having an absolute value of one. Also, within these differences of ones, a significant portion of them are isolated (surrounded by zero-valued coefficients) along the path of a scanning. It is wasteful to use one amplitude code word to code each of these isolated ones in addition to using one runlength code word to identify their address (Runlength alone should be enough).

**Ordered Redundancy Coding**

A new Ordered Redundancy (OR) coding algorithm is specifically designed to code multi-valued digital numbers where the statistical frequency of occurrence of some values in the series of values forming the digital number is greater than the statistical frequency of occurrence for other values in the series of values forming the digital number. The values forming the digital numbers are generally the integers 0, 1, 2, 3, . . . and so on. In general, a K-valued digital number, X(k), is formed by a series of K values, x(k), as follows:

$$X(k) = x(1), x(2), x(3), \dots, x(k), \dots, x(K)$$

where  $1 \leq k \leq K$ . Each value, x(k), has some value,  $V_j$ , from the set of J values,

$$V_1, V_2, V_3, \dots, V_j, \dots, V_J$$

where  $1 \leq j \leq J$ .

The occurrence of i consecutive values,  $V_j$ , within the series X(k) is the runlength of such values denoted by  $V_j$ .

In a first example with  $k=1, \dots, 14$ , if the digital number  $X_1(k) = 01000000100021$ ,  $V_0=0$ ,  $V_1=1$  and  $V_2=2$  then  $X_1(k) = V_0^1, V_1^1, V_0^6, V_1^1, V_0^3, V_2^1, V_1^1$ . In the series values forming  $X_1(k)$ , the first value  $V_0=0$  occurs most frequently, the second value  $V_1=1$  occurs next most frequently, and the other value  $V_2=2$  occurs least frequently.

In a second example with  $k=1, \dots, 14$ , if the digital number  $X_2(k) = 02111110001130$ , and  $V_0=1$ ,  $V_1=0$ ,  $V_2=2$ , and  $V_3=3$ ; then  $X_2(k) = V_1^1, V_2^1, V_0^5, V_1^3, V_0^2, V_3^1, V_1^1$ . In the series of values forming  $X_2(k)$ , the first value,  $V_0=1$ , occurs most frequently, the second value  $V_1=0$  occurs next most frequently, and the other values,  $V_2=2$  and  $V_3=3$ , occur next most frequently.

Digital numbers formed with such frequencies of occurrence of values such as for  $X_1(k)$  and  $X_2(k)$  above, are defined as having ordered redundancy. In the typi-

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cal example described for  $X_1(k)$ , 0's are most redundant, 1's are next most redundant, and so on. The frequency of occurrence order of values 0, 1, 2, . . . and so on described is merely one typical example. Any frequency of occurrence order is possible, for example, the 2's may occur more frequently than 1's and 0's may occur more frequently than 2's.

Digital numbers,  $X(k)$ , will often have ordered redundancy of the values,  $V_i$ , forming the number. Ordered redundancy means that the frequency of occurrence of some of the values,  $V_i$ , forming the number (or groups of such values) is greater than that for other values (or other groups of such values) forming the number and that such frequencies of occurrence are predictable for a number of digital numbers,  $X(k)$ .

When such ordered redundancy occurs, the ordered redundancy coding of the present invention is useful in making the coding more efficient. In the present invention, the presence of a first value (or a first set of values) is used to imply the existence of a second value (or a second set of values) thereby eliminating the need to code the second value (or second set of values).

By way of example, the coding of the digital number  $X_1(k)$  above is achieved as follows. Assume that when the first value,  $V_0$ , is followed by the second value,  $V_1$ , that the second value is implied and such code is denoted  $C_{01}^i$  where  $i$  represents the number of consecutive first values  $V_0$  preceding the implied second value,  $V_1$ . Assume that when the first value  $V_0$  is not followed by the second value,  $V_1$ , such code is denoted  $C_{01}^i$ . Assume that any other value is amplitude coded with  $A_2=2$  and  $A_3=3$ . With such a notation,  $X_1(k)=C_{01}^1, C_{01}^2, C_{01}^3, A_2, C_{01}^0$ .

By way of the second example,  $X_2(k)$  above, the first value,  $V_0=1$  implies the second value,  $V_1=0$  such that  $X_2(k)=C_{01}^0, C_{01}^1, A_2, C_{01}^2, C_{01}^0, C_{01}^0, C_{01}^0, A_2, C_{01}^0$ .

In order to code  $X_1(k)=C_{01}^1, C_{01}^2, C_{01}^3, A_2, C_{01}^0$ , each of the values  $C_{01}^1, C_{01}^2, C_{01}^3, A_2, C_{01}^0$  are represented by a unique statistical code (typically a binary code) from a runlength table such that the statistically more frequently occurring values have shorter code lengths and the statistically less frequently occurring values have longer code lengths.

A series of values in digital numbers having a large percentage of zeros (0's) followed by ones (1's) is termed "One's Redundancy". One's Redundancy Coding is one example of Ordered Redundancy (OR) coding. The OR coding procedures for One's Redundancy appear in TABLE 3 and are based upon  $16 \times 16$  transform blocks of values where each such block gives rise to a digital number,  $X(k)$ , having 256 values. Of course, any size blocks ( $N \times M$ ) of digital values can be selected. Also, the digital values can be in block form representing transform coefficients or can be multi-valued digital signals,  $X(k)$ , of any form.

In order to identify the beginning or end of the values forming a number,  $X(k)$ , a special "End of Block" signal, EOB, is utilized. When a plurality of numbers  $X_1(k), X_2(k), X_3(k), \dots$  and so on are to be coded and transmitted, the EOB code is inserted between the numbers, usually once after each number.

The TABLE 3 example is premised upon digital signals having first values  $V_1=0$ , second values  $V_2=1$ , and a set of other values,  $V_3$ , greater than 1 (2, 3, 4, . . .). Also, TABLE 3 has a runlength table partitioned into first and second parts, a first part, R (or  $C_{01}$ ), and a second part, R' (or  $C_{01}$ ). The first part, R, implies that a

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runlength of 0's is followed by a 1. The second part, R', implies that a runlength of 0's is followed by another value greater than 1 (2, 3, 4, . . .). The TABLE 3 formulation is for one preferred embodiment of the ordered redundancy coding. Many variations, some hereinafter described, are possible.

TABLE 3

1. From the magnitude (without sign) of quantized coefficient difference, form the following sets of histograms
  - a. Runlength of consecutive zero-value coefficient differences (including runlength of zero length) with absolute amplitude value of one at the end of the runlength.
  - b. Runlength of consecutive zero-valued coefficient differences (including runlength of zero length) with absolute amplitude value of greater than one at the end of the runlength.
  - c. Occurrence of end of blocks (EOB, all 0's)
2. Get runlength Huffman code table from the histogram of 1 above. The entries of this table can be represented as  $R_0, R_1, R_2, \dots, R_{255}, R'_0, R'_1, R'_2, \dots, R'_{255}, \text{EOB}$ .
3. From case b of 1, get the histogram of the amplitudes (with values greater than one) at the end of the runlength.
4. Get amplitude Huffman code table from the histogram of 3 above. The entries of this table can be represented as  $A_2, A_3, A_4, \dots, A_{510}$ .
5. Encode the coefficient differences along the zig-zag path from the Huffman tables generated from 2 and 4 in the following fashion.
  - a. Coefficient differences of one at the end of the consecutive zeros—encode with  $R+\text{SIGN}$ ,  $n=1, 2, 3, \dots, 255$ .
  - b. Coefficient differences of greater than one at the end of consecutive zeros—encode with  $R'+A_m+\text{SIGN}$ ,  $n=1, 2, 3, \dots, 255$  and  $m=2, 3, 4, \dots, 510$ .
6. Encode with EOB at the end of each block.

As can be seen from TABLE 3, two Huffman tables or equivalent statistical coding tables are specified in the "One's Redundancy" (OR) coding. The runlength table (including EOB) consists of two parts, R and R', with a total of 513 entries (256 each for the first part R and the second part R' and 1 for EOB). The amplitude table consists of 509 entries (amplitude values of 2 to 510). In a practical implementation, these two tables can be shortened with little performance degradation.

Specific examples of the two tables specified in accordance with TABLE 3 appear as the following TABLES 6 and 7. TABLE 6 is a runlength table of the two part example (R and R' or  $R_1$  and  $R_2$ ) where R implies a runlength of 0's followed by a 1. TABLES 6 and 7 are derived based upon the hardware constraints (which are intended to be representative of a practical system, but are not intended to be limiting) of the following TABLE 4:

TABLE 4

1. Every code word must belong to part of a complete "tree".
2. The longest code word (including runlength escape, runlength code and sign, or amplitude escape and amplitude code) must not exceed 16 bits in length.
3. The maximum number of entries for each runlength or amplitude table must not exceed 32.

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TABLE 5 gives four comparative examples for coding digital numbers using Scene Adaptive Coding (SAC) and One's Redundancy (OR) coding. The One's Redundancy coding examples utilize TABLES 6 and 7 and the Scene Adaptive Coding examples utilize TABLES 8 and 9. As can be seen from TABLE 5, the OR coding is considerably shorter than the SAC coding and hence OR coding is more efficient.

TABLE 5

COMPARISON OF "OR" AND "SAC" CODING	
1. CO	0000000000000001 EOB
SAC	RLP+R <sub>19</sub> +A <sub>1</sub> +S+EOB 01/111011/11/0/100001
OR	R <sub>19</sub> +S+EOB 0001000/0/0010
2. CO	001-1000001000-1 EOB
SAC	RLP+R <sub>1</sub> +A <sub>1</sub> +S+A <sub>1</sub> +S+RLP+R <sub>5</sub> +A <sub>1</sub> +S+RLP+R <sub>1</sub> +A <sub>1</sub> +S+EOB 01/1111/11/0/11/1/01/11010/11/0/01/1011/11/1/100001
OR	R <sub>2</sub> +S+R <sub>0</sub> +S+R <sub>3</sub> +S+R <sub>2</sub> +S+EOB 1110/0/1/0/1/00011/0/0000/1/0010
3. CO	2000000-1 EOB
SAC	A <sub>2</sub> +S+RLP+R <sub>2</sub> +A <sub>1</sub> +S+EOB 101/0/01/110011/11/1/100001
OR	R <sub>0</sub> +A <sub>2</sub> +S+R <sub>7</sub> +S+EOB 110/1/0/011110/1/0010
4. CO	1001-200001 EOB
SAC	A <sub>1</sub> +S+R <sub>2</sub> +A <sub>1</sub> +S+A <sub>2</sub> +S+R <sub>4</sub> +A <sub>1</sub> +S+EOB 11/0/1111/11/0/101/1/11100/11/0/10001
OR	R <sub>0</sub> +S+R <sub>2</sub> +S+R <sub>0</sub> +A <sub>2</sub> +S+R <sub>4</sub> +S+EOB 10/0/1110/0/11011/01101/0/0010

where,  
 R=runlength, A=amplitude, S=positive sign,  
 S̄=negative sign, RLP=Run Length Prefix (01),  
 EOP=End Of Block, CO=digital number to be coded

TABLE 6

RUN LENGTH CODE TABLE FOR THE "ONE'S REDUNDANCY" CODING				
RUN LENGTH CODES FOR DPCM MODE				
T L	FREQ	# of BITS	CODE	OCTAL EQUIV
R 0	26644.	2	10	2
R' 0	15621.	3	110	6
R 1	12324.	3	010	2
R 2	7148.	4	1110	16
R 3	4610.	4	0000	0
R 4	3384.	5	01101	15
R' 1	3143.	5	01100	14
R 5	2577.	5	00011	3
R 6	1967.	6	111100	74
R 7	1764.	6	011110	36
R 8	1452.	6	001111	17
R 9	1327.	6	001101	15
R 10	1089.	6	000101	5
R' 2	1013.	7	1111011	173
R 11	994.	7	1111010	172
R 12	884.	7	0111011	73
R 13	876.	7	0111010	72
R 14	861.	7	0011100	71
R 15	687.	7	0011100	34
R 16	673.	7	0011001	31
R 17	602.	7	0011000	30
R 18	550.	7	0001001	11
R 19	496.	7	0001000	10
R 20	485.	8	01111101	175
R 21	455.	8	01111100	174
R 22	413.	8	01110001	161
R' 3	402.	8	01110000	160
R 23	370.	8	00111011	73
R 24	345.	8	00111010	72
R ESC	4599.	5	11111	37
R' ESC	982.	7	0111111	77

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TABLE 6-continued

RUN LENGTH CODE TABLE FOR THE "ONE'S REDUNDANCY" CODING				
RUN LENGTH CODES FOR DPCM MODE				
T L	FREQ	# of BITS	CODE	OCTAL EQUIV
EOB	5047.	4	0010	2

where,  
 R ESC=code used whenever R-type value not in table  
 R' ESC=code used when R'-type value not in table.

TABLE 7

AMPLITUDE CODE TABLE FOR THE "ONE'S REDUNDANCY" CODING				
AMPLITUDE CODES FOR DPCM MODE				
A	FREQ	# of BITS	CODE	OCTAL EQUIV
A 2	11076.	1	1	1
A 3	3846.	2	00	0
A 4	1751.	4	0110	6
A 5	982.	5	01111	17
A 6	663.	5	01010	12
A 7	435.	6	01100	34
A 8	347.	6	010011	23
A 9	277.	6	010001	21
A 10	173.	7	0101100	54
A 11	178.	7	0101101	55
A 12	137.	7	0100100	44
A 13	113.	8	01110101	165
A 14	116.	8	01110110	166
A 15	79.	8	01001010	112
A 16	68.	8	01000011	103
A 17	67.	8	01000010	102
A 18	58.	9	011101110	356
A 19	49.	9	011101000	350
A 20	50.	9	011101001	351
A 21	30.	10	011101111	737
A 22	32.	9	010000010	202
A 23	33.	9	010000011	203
A 24	20.	10	0100101100	454
A 25	31.	9	010000001	201
A 26	22.	10	010010101	455
A 27	30.	9	010000000	200
A 28	23.	10	0100101110	456
A 29	14.	11	0100101111	1137
A 30	14.	11	0111011100	1674
A 31	10.	11	0100101110	1136
A 32	14.	11	0111011101	1675
A ESC	423.	6	01011	27

where,  
 ESC=code used when amplitude value not in table.

TABLE 8

RUN-LENGTH CODES FOR "SCENE ADAPTIVE CODING"		
VALUE	LENGTH	HUFFMAN CODE
1	1	0
2	4	1111
3	4	1011
4	5	11100
5	5	11010
6	5	10000
7	6	110011
8	6	110010
9	6	110001
10	6	110000
11	6	101011
12	6	101001
13	6	101000
14	6	100111
15	6	100110
16	6	100101
17	8	100100
18	6	100010

TABLE 8-continued

RUN-LENGTH CODES FOR "SCENE ADAPTIVE CODING"		
VALUE	LENGTH	HUFFMAN CODE
19	7	1110111
20	7	1110110
21	7	1101111
22	7	1101110
23	7	1101101
24	7	1101100
25	7	1010101
26	7	1000111
27	7	1000110
28	8	10101000
29	9	101010011
30	9	101010010
RL-ESC	6	111010

TABLE 9

AMPLITUDE CODES FOR SCENE ADAPTIVE CODING		
VALUE	LENGTH	HUFFMAN CODE
1	2	11
2	3	101
3	3	000
4	4	0011
5	5	10001
6	5	00100
7	6	100101
8	6	100000
9	7	1001110
10	7	1001100
11	7	0010111
12	8	10011111
13	8	10011011
14	8	10010011
15	8	10010001
16	8	00101101
17	9	100111101
18	9	100110101
19	9	100110100
20	9	100100100
21	9	100100000
22	9	001011001
23	9	001011000
24	10	1001111001
25	10	1001111000
26	10	1001001011
27	10	1001001010
28	10	1001000011
29	10	1001000010
AMP-ESC	6	001010
EOB	6	100001
RL-PREFIX	2	01

Ordered Redundancy Variations

Additional variations are possible, for example, three or more parts or their equivalent may be used in the runlength table. A typical example with three parts (R, R' and R'') is as follows. Runlengths of consecutive first values ( $V_1=0$ ) are runlength encoded with three different parts ( $R_1, R_2,$  or  $R_3$ ) depending upon the value following the runlength of 0's. If the following value is a second value (such as  $V_2=1$ ), then  $R_1$  is selected for encoding the runlength of the first value (0's in this case). If the following value is a third value (such as  $V_3=2$ ), then  $R_2$  is selected for encoding the runlength of the first value (0's in this case). If the following value is another value (greater than 2 such as 3, 4, 5, ...), then  $R_3$  is selected for encoding the runlength of the first value (0's in this case). If  $R_3$  is selected, then  $R_3$  is followed by an amplitude code to specify the exact value (3, 4, 5, ...) following the runlength of first values (0's).

The runlength table utilized with ordered redundancy coding can be of two parts (R and R'), three parts

( $R_1, R_2,$  and  $R_3$ ), or more generally of "n" parts ( $R_1, R_2, \dots, R_n$ ), where n is equal to or greater than 2.

The TABLES 6 and 7 were formed based upon the assumption that a separate sign bit, S or  $\bar{S}$ , not in the tables is to be used to indicate the sign of each value coded in the manner indicated in TABLE 5. Alternatively, the sign information can be encoded into TABLE 6 or TABLE 7. For example, a table like TABLE 6 can be used to represent runlengths of 0's that are followed both by positive and by negative non-zero numbers. Such a table would be greater in length than TABLE 6 (expanded essentially to double the length) to provide entries for runlengths of 0's followed by both negative and positive non-zero numbers. Of course, such a table would be ordered in accordance with the statistical frequency of both positive and negative numbers.

The two tables, TABLES 6 and 7, were formed based upon the assumption that the values to be coded were categorized into three basic groups or values, namely a first value,  $V_1$ , a second value,  $V_2$ , and all other values. In the particular example of coding, the first value  $V_1$  is 0, the second value  $V_2$  is 1, and the third value is one within the set of all values greater than 1. It often occurs that in a block of values to be coded, the value 0 (the first value) occurs statistically most frequently, the value 1 (the second value) occurs statistically second most frequently, and the other values (the third values) the least frequently.

With such a distribution having ordered redundancy, the coding of the second value (1's in this case) is avoided because the first value (0's in this case) is runlength coded in two parts, one part that implies that the number following the runlength of 0's is the second value (1 in this case) and the other part that indicates that the number following the runlength of 0's is within the set of third values (values greater than 1 in this case).

Alternative formulations are possible. For example, rather than categorizing the values to be coded into three groups as done in connection with TABLE 6, four or more groups are possible. For four groups, the first value (for example  $V_1=0$ ) is coded in three parts, namely, a first part for implying a second value (for example  $V_2=1$ ), a second part for implying a third value (for example  $V_3=2$ ) and a third part for indicating a set of fourth values (values greater than 2).

In general, a multivalued digital number,  $X(k)$ , to be coded with n-1 implied values has a first value,  $V_1$ , a second value,  $V_2, \dots, a j$ -value,  $V_j, a (j+1)$ -value,  $V_{j+1}, \dots, a n$ -value,  $V_n$ , for j ranging from 1 to n, and has other values. The digital signals are coded with n-1 implied values to form statistically coded signals such that the more frequently occurring values of the digital signals are represented by shorter code lengths and the less frequently occurring values of coded signals are represented by longer code lengths. The coding includes, for each value,  $V_j$ , for j from 1 to n, forming  $j^{th}$  runlength code values representing the number of consecutive first values followed by the j + 1 value, forming additional runlength code values representing the number of consecutive first values followed by any of said other values.

While the embodiments described have used one code (such as R) based upon the existence of a runlength of a first value to imply a second value, the implied code is not limited to a single value but can be itself multivalued. For example, a runlength of 0's followed by two 1's can be implied by a code R''.

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While the implied coding of the second value was typically as a result of runlength coding the first value, other types of coding of the first value are included within the present invention.

As another alternative, the statistically most frequent value is not necessarily the value that is runlength encoded. Where three groups of values are employed (such as 0's, 1's and greater than 1's), the second value (1's in this case) can be runlength encoded to imply the first value (0's in this case) or to specify the third values (numbers greater than 1 in this case).

In an example where the number of values  $V_j$  are limited, the need for amplitude coding can be eliminated. For example, if only the values  $V_1=0$  and  $V_2=1$  are present in the number  $X(k)$ , then no amplitude coding is required since the  $V_1=0$  values can be runlength coded and the values of  $V_1=1$  can be implied. Similarly, for an example with only the values  $V_1=0$ ,  $V_2=1$ , and  $V_3=2$ , the values of  $V_1=0$  can be runlength coded while both  $V_2=1$ , and  $V_3=2$ , are implied using a two-part runlength table as previously described.

In an example where all of the values have the same sign, the sign coding can be eliminated.

#### Coder Details—FIG. 3

In FIG. 3, further details of the coder 14 of FIG. 2 are shown. In FIG. 3, each digital value,  $V_j$ , of a digital number,  $X(k)$ , to be coded is input to the CO register 76. Typically, the register 76 is a 16-bit register for storing 16-bit values where the digital number,  $X(k)$ , is formed of  $K$  16-bit values, each value clocked into register 76 in sequence and one at a time. The comparator 77 compares the absolute value of each value in register 76 to determine if that absolute value is less than 1, equal to 1, or greater than 1. Comparator 78 provides a less-than-1 output signal on line 78, an equal-to-1 signal on line 79, and a greater-than-1 signal on line 80 as a function of the value in register 76. The less-than-1 signal on line 78 indicates an equal-to-0 condition. The control 81 receives the three control values on line 78, 79 and 80 from comparator 77 and controls, in a conventional manner, the coder operations.

The "zero" counter 82 counts the runlength of consecutive zeros detected by the comparator 77. Line 86 from control 81 causes counter 82 to be set to a counting mode for counting consecutive 0 values in register 76. Line 86 causes counter 82 to be reset after each runlength of zeros is counted. After being reset and with line 86 setting counter 82 to the counting mode, counter 82 will count zeros until a non-zero value is detected in register 76. If a non-zero value is detected, either a equal-to-1 signal on line 79 or a greater-than-1 signal on line 80 is enabled and detected by control 81. If an equal-to-1 signal is detected, control 81 asserts the line 87 to specify the R type of operation. The enable line 87 together with the runlength count from counter 82 addresses the runlength table 84. Runlength table 84 is typically a random access memory or a read only memory storing coded runlength values like those of TABLE 6. The 0 runlength output on line 95 from counter 82 together with the 1-bit on line 87 address the table 84 to provide a runlength coded value output on lines 93. The output from table 84 is under control of the signal on line 89 from control 81 and loads the code register 85 with the runlength coded value from the CODE column of TABLE 6. The runlength coded value implies that a runlength of zeros is followed by a 1 in the manner previously described.

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After a coded value is loaded into register 85, the sign bit from register 76 is enabled to be stored in register 85 by the enable gate 91 under control of the signal 94 from the control 81.

Thereafter, the next value,  $V_j$ , of the number,  $X(k)$ , is loaded into register 76. Counter 82 is cleared and a new runlength of zeros is counted until comparator 77 detects a non-zero value by asserting either an equal-to-1 signal on line 79 or a signal on line 80 signifying a greater-than-1 value in register 76. If the runlength of zeros is followed by a value greater than 1, then line 80 is asserted and control 81 causes line 87 to be not asserted, thereby signifying an R'-type of operation. The runlength value from counter 82 on line 95 together with the non-asserted signal on line 87 causes the runlength table 84 to be addressed to obtain a R' value from table 84. Line 89 causes the output from table 84 to be gated to the code register 85.

Because of a greater than 1 value in register 76, control 81 causes the line 88 to be next enabled to provide an output from the amplitude table 83. The amplitude table 83 is a random access memory or read only memory loaded with amplitude values like those of TABLE 7. The value in register 76 addresses the amplitude table 83 to provide the appropriate amplitude value output on line 93 for storage in the code register 85. Thereafter, the control 81 causes line 94 to be enabled to cause the sign value from register 76 to be stored in the code register 85.

The FIG. 3 coder continues to process code values in register 76 until an entire block of code values (all values for a digital number,  $X(k)$ ) has been processed. Control 81 includes counters and other appropriate means for counting or otherwise determining all values comprising a digital number. When a full series of values for a digital number  $X(k)$  has been processed, control 81 enables the output line 93 to provide an end of block, EOB, signal on line 93 for storage in the control register 85. Control 81 provides the CLK<sub>1</sub> signal for clocking each new value into register 76, provides the CLK<sub>2</sub> signal for incrementing the zero counter 83 and CLK<sub>3</sub> signal for clocking values into register 44. In a conventional manner, control 81 is controlled by a master clock signal CLK, from the transmitter of FIG. 2.

In FIG. 3, when the amplitude table 83 is addressed and produces the ESC code, the ESC detector 126 senses that no amplitude value is available in the table and signals control 81. The ESC value from table 83 is gated into the code register 85. Thereafter, control 81 enables gate 127 via line 181 to gate the value from register 76 into the code register 85. Alternatively, an additional table (not shown) can be provided for storing Huffman coded values of amplitudes not in the table 83. Such an additional Huffman table would provide compression of additional amplitude values.

In FIG. 3, when the runlength table 84 provides the R ESC or the R' ESC code value, the ESC detector 126 senses the ESC value and signals the control 81 on line 130. The ESC code value is clocked into register 85, and on the next cycle, control 81 causes alternate processing to occur. In the example described, gate 129 is enabled to enter directly the value from counter 82 into the code register 85 so that runlengths not in the runlength table 84 are directly entered after the ESC code. Alternatively, an additional runlength table with Huffman coded runlength values can be employed to provide additional compressed runlengths not in the table 84.



While FIG. 3 depicts one embodiment for implementing the coder 14 of FIG. 2, many other software and hardware implementations of the coder are, of course, possible.

Decoder Detail—FIG. 4

In FIG. 4, further details of the decoder 54 of FIG. 1 are shown. The serial-by-bit data is input on line 117 to the code register 101. The input data, as it is clocked into the register 101 by the CLK<sub>4</sub> signal, is continuously detected by the detector 102. Detector 102 senses the synchronization, header and other control information and signals the control 107 when coded data is to follow. The coded data is clocked into register 101 one bit at a time. A code value clocked into register 101 is presented in left-to-right order when viewing the CODE column of TABLE 6. With each new code value bit, the coded data from register 101 is input to the inverse runlength table 103 and to the inverse amplitude table 104. The runlength table 103 includes the data of TABLE 6 organized in an inverse order. The inverse order means that table 103 of FIG. 4 is addressed by the CODE column code values and provides as an output the type (R or R') from column T and the length from column L. The type information appears on output line 113. Line 113 is one binary value (for example 1) when the addressed value is of type R and is another binary value (for example 0) when the type is R'.

The R/R' information on line 113 is connected to the control 107. The L information from table 103 is input on line 119 to the runlength counter 105. Typically, the L information is a binary count and runlength counter 105 is parallel loaded with the binary count under control of line 114 from control 107.

If an R ESC or an R' ESC value is detected by detector 102, control 107 is signaled that no valid runlength will be derived from table 103. When control 107 senses that the ESC code has appeared in register 101, control 107 causes the content of the register 101 through gate 125 to be gated into the runlength counter 105. Thereafter, runlength counter 105 is decremented in the manner previously described.

Line 116 output from the table 103 is a validity bit indicating that a valid entry has been found in table 103. As each new code value bit is clocked into register 101, table 103 is addressed to determine if a valid entry is found. Not all input codes from register 101 will find a valid entry in table 103. All valid entries in table 103 provide a validity bit output on line 116 for signalling the control 107. When control 107 receives a valid bit from line 116, the length value for the addressed entry is stored into the runlength counter 105. Thereafter, the runlength counter 105 is decremented by the CLK<sub>5</sub> signal thereby counting out the runlength of zeros. Control line 118 inhibits any output from the amplitude table 104 whenever counter 105 is being decremented thereby loading zeros into the CO register 109. When the counter 105 has been counted down and the entire runlength of zeros has been loaded into register 109, control 107 has sensed the R or R' signal from line 113 and thereafter provides the following sequencing.

If line 113 indicated an R-type operation, then line 121 loads a 1 into the register 109 since R-type operations imply a 1 after a runlength of zeros. When line 121 writes a 1 into register 109, gate 108 is enabled by line 119 to load the sign bit, which will be the next bit in order clocked into register 101 into the register 109. Thereafter register 101 will be cleared and clocked to receive the next code bits.

If line 113 indicates an R'-type operation, then line 121 is not enabled and line 118 is enabled to read out an amplitude from amplitude table 104. Amplitude table 104 contains the information of TABLE 7 in inverse order. The inverse order indicates that table 104 is addressed by the information in the CODE column and provides an output on line 120 from the A column. Typically, the output value from the A column is a binary number representing the amplitude.

If an ESC value is called for, detector 102 signals control 107 to indicate that no valid amplitude will be obtained from table 104. When the A ESC code appears in the code register 101, the control 107 causes the next amplitude value in code register 101 to be gated directly via gate 108 to the CO register 109.

After an amplitude value is loaded into register 109 from table 104 or register 101, control 107 then signals via line 119 the loading of the sign bit from register 101 into register 109. Register 101 is then cleared to receive the next code value on line 117 from the buffer 53 of FIG. 1.

While FIG. 4 depicts one embodiment of a decoder in accordance with the present invention, many other software and hardware embodiments of the FIG. 5 decoder are possible.

Rate Buffer

The rate buffer 15 in FIG. 2 performs channel rate equalization. The buffer has a variable rate data input on lines 44 and a constant rate data output on lines 44. The differentials are monitored from frame to frame, and the status is converted into a scaling factor that is fed to the normalizer on lines 25. The buffer always forces the coder to adjust to the local coding variations, while ensuring global performance at a desired level.

Let B(n) represent the number of bits into the rate buffer for the nth frame and let S(n) represent the buffer status (difference between the read and write pointers of the FIFO) at the end of the nth frame. Then, B(n) and S(n) can be written as follows:

$$B(n) = K + N_1 + 12 N_2 + \dots \quad \text{Eq. (12)}$$

$$2N_3 + \sum_{i \in N_3} H(\{i(u,v)\}) +$$

$$11N_4 + \sum_{i \in N_4} H(\{i(u,v)\}) +$$

$$4N_5 + \sum_{i \in N_5} H(\{i(u,v)\})$$

$$S(n) = S(n-1) + [B(n) - N^2 R] \quad \text{Eq. (13)}$$

where

- N<sub>1</sub> = number of blocks in replenishment mode
- N<sub>2</sub> = number of blocks in motion compensated replenishment mode
- N<sub>3</sub> = number of blocks in DPCM mode
- N<sub>4</sub> = number of blocks in motion compensated DPCM mode
- N<sub>5</sub> = number of blocks in intraframe mode
- {i(u,v)} = normalized and quantized coefficient differences in ith block
- H(.) = "One's Redundancy" coding function R = average coding rate
- N = transform block size
- K = sync, header, and NF
- i<sub>3</sub>N<sub>3</sub> = i belongs to N<sub>3</sub> DPCM block

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$i, N_4 = i$  belongs to  $N_4$  DPCM block

$i, N_5 = i$  belongs to  $N_5$  DPCM block

The buffer status  $S(n)$  is used to select an instantaneous scaling factor  $D^*(n)$  according to an empirically determined "scaling factor versus status" curve. This relationship is described by

$$D^*(n) = \Phi(S(n)) \quad \text{Eq. (14)}$$

In order to smooth out this instantaneous scaling factor such that the desired scaling factor does not fluctuate too much, a recursive filtering process is applied as follows:

$$D(n) = (1-c)D(n-1) + cD^*(n) \quad \text{Eq. (15)}$$

where  $c$  is a constant with value less than unity. The rate buffer can be guaranteed not to overflow by introducing a frame repetition mechanism. It can also be prevented from underflow by introducing fill bits.

#### Frame Repetition

The requirement of a frame repetition in the Motion Compensated Combined Interframe and Intraframe Coding System of FIG. 2 is well justified. Due to the usage of only one normalization factor per frame, an excessive amount of data can flow into the buffer during a scene cut or fast zooming operations. Only instantaneous shutting off of the input data like the frame repetition will prevent the rate buffer from overflowing. Also, in order to prevent the scaling factor from getting too large to introduce blocking artifacts, a frame repetition is desired.

To establish frame repetition in the rate buffer, a threshold in the rate buffer is first established. During the encoding process, if the data within the buffer exceeds this threshold at the end of the frame, frame repetition is initiated to stop the input data. The repetition process is stopped when the data within the buffer is reduced to a level lower than the threshold.

While the invention has been particularly shown and described with reference to preferred embodiments thereof, it will be understood by those skilled in the art that the foregoing and other changes in form and details may be made therein without departing from the spirit and scope of the invention.

What is claimed is:

1. A method for processing digital signals, where the digital signals have first values, second values and other values, to reduce the amount of data utilized to represent the digital signals and to form statistically coded signals such that the more frequently occurring values of digital signals are represented by shorter code lengths and the less frequently occurring values of digital signals are represented by longer code lengths, comprising,

forming first runlength code values representing the number of consecutive first values of said digital signals followed by said second value,

forming second runlength code values representing the number of consecutive first values of said digital signals followed by one of said other values.

2. The method of claim 1 further including the step of amplitude encoding said other values.

3. The method of claim 1 further including the step of encoding said first and second runlength code values with a sign value.

4. The method of claim 1 wherein said first values have amplitude zero, said second values have absolute amplitude one, and said other values have absolute

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amplitudes greater than one whereby said first and second runlength codes values are formed representing the number of consecutive zeros.

5. The method of claim 1 wherein said first values have the highest frequency of occurrence in said digital signals, wherein said second values have the next highest frequency of occurrence in said digital signals, and wherein said other values have the lowest frequency of occurrence in said digital signals.

6. A method for processing input signals to reduce the amount of data utilized to represent the input signals, the steps comprising,

processing the input signals to form processed signals where the processed signals are digital numbers having first values, second values, and other values,

coding each digital number to form statistically coded signals such that the more frequently occurring values in the digital numbers are represented by shorter code lengths and the less frequently occurring values of coded signals are represented by longer code lengths, said coding including,

forming first runlength code values representing the number of consecutive first values followed by said second value in a digital number,

forming second runlength code values representing the number of consecutive first values followed by one of said other values in the digital number.

7. The method of claim 6 wherein said coding step includes the step of amplitude encoding said other values.

8. The method of claim 6 wherein said coding step includes the step of encoding said first and second runlength code values with a sign value.

9. The method of claim 6 wherein said processing step forms said first values with amplitude zero, forms said second values with absolute amplitude one, and forms said other values with absolute amplitudes greater than one.

10. The method of claim 6 wherein a table is provided storing a plurality of runlength code values representing a plurality of different numbers of consecutive first values followed by said second value, and storing a plurality of second runlength code values representing a plurality of different numbers of consecutive first values followed by one of said other values, said first runlength code values and said second runlength code values statistically organized in said table such that the statistically more frequently occurring runlength code values are represented by shorter code lengths and the less frequently occurring values are represented by longer code lengths, and wherein

said step of forming first runlength code values is performed by table lookup from said table, said step of forming second runlength code values is performed by table lookup from said table.

11. The method of claim 6 wherein said coding step further includes the step of providing an end code to designate the end of a digital number.

12. A method for processing digital signals, where the digital signals have first values, second values and other values, where the processing reduces the amount of data utilized to represent the digital signals and where the processing forms statistically coded signals such that the more frequently occurring values of digital signals are represented by shorter code lengths and the

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less frequently occurring values of digital signals are represented by longer code lengths, comprising,

forming a first code value representing a set of said first values followed by said second value,

forming a second code value representing a set of said first values followed by one or more of said other values.

13. A method for processing digital signals to reduce the amount of data utilized to represent the digital signals, the steps comprising,

processing the digital signals to form processed signals where the processed signals are multivalued digital numbers and have first values, second values, . . . ,  $j$ -values,  $(j+1)$ -values, . . . ,  $n$ -values for  $j$  ranging from 1 to  $n$ , and have other values,

coding said processed signals to form statistically coded signals such that the more frequently occurring values of the processed signals are represented by shorter code lengths and the less frequently occurring values of coded signals are represented by longer code lengths, said coding including,

forming  $j^{\text{th}}$  runlength code values representing the number of consecutive processed signals of said first value followed by said  $j+1$  value, for each value of  $j$  from 1 to  $n$ ,

forming additional runlength code values representing the number of consecutive processed signals of said first value followed by any of said other values.

14. The method of claim 13 wherein said coding step includes the step of amplitude encoding said other values.

15. The method of claim 13 wherein said coding step includes the step of encoding said  $j$  runlength code values with a sign value.

16. The method of claim 13 wherein said processing step with  $n=2$  forms said first values with  $j=1$  equal to amplitude zero, forms said second values with  $j=2$  equal to absolute amplitude one, and forms said other values with absolute amplitudes greater than one.

17. The method of claim 13 wherein said processing step forms said first values with  $j=1$  equal to amplitude zero, forms said second values with  $j=2$  equal to absolute amplitude one, and forms third values with  $j=3$  equal to absolute amplitude two, and forms other values for  $n=3$  with absolute amplitude greater than 2.

18. The method of claim 6 wherein said processing step includes multiple modes of processing said digital signals to form said processed signals, and includes the step of selecting one of said modes based upon differences in said input signals.

19. The method of claim 6 wherein said input signals represent images and are presented in sequential frames, said processing step including multiple processing modes for processing said input signals to form said processed signals, and including the step of forming the mean-square difference,  $d_0$ , between input signals from the current frame and representations of input signals from the previous frame and includes the step of forming the mean-square error,  $d_b$ , between input signals from the present frame and the best matched representation of input signals from the previous frame, said processing step including the step of comparing the difference,  $d_0-d_b$ , with a motion threshold  $T_M$ , and selecting one of said modes based on said comparison.

20. The method of claim 19 including the step of determining when  $d_0-d_b$  is less than  $T_M$  and further including the step of selecting a non-motion-compensated replenishment mode when  $d_0$  is less than a predetermined threshold  $T_R$  and  $d_0-d_b$  is less than  $T_M$ .

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sated replenishment mode when  $d_0$  is less than a predetermined threshold  $T_R$  and  $d_0-d_b$  is less than  $T_M$ .

21. The method of claim 19 including the step of determining when  $d_0-d_b$  is less than  $T_M$  and further including the step of selecting a non-motion-compensated DPCM mode when  $d_b$  is less than a predetermined threshold  $T_{D/R}$  and  $d_0-d_b$  is less than  $T_M$ .

22. The method of claim 19 including the step of selecting an intraframe mode when  $d_0$  is greater than a predetermined threshold  $T_{D/I}$ .

23. The method of claim 19 including the step of determining when  $d_0-d_b$  is greater than  $T_M$  and further including the step of selecting a motion compensated replenishment mode when  $d_b$  is less than predetermined threshold  $T_{D/R}$  and  $d_0-d_b$  is greater than  $T_M$ .

24. The method of claim 19 including the step of determining when  $d_0-d_b$  is greater than  $T_M$  and further including the step of selecting a motion compensated DPCM mode whenever  $d_b$  is greater than a predetermined threshold  $T_{D/R}$  and  $d_0-d_b$  is greater than  $T_M$ .

25. An apparatus for processing digital signals, where the digital signals have first values, second values and other values, to reduce the amount of data utilized to represent the digital signals and to form statistically coded signals such that the more frequently occurring values of digital signals are represented by shorter code lengths and the less frequently occurring values of digital signals are represented by longer code lengths, comprising,

means for forming first runlength code values representing the number of consecutive first values of said digital signals followed by said second value, means for forming second runlength code values representing the number of consecutive first values of said digital signals followed by one of said other values.

26. The apparatus of claim 25 further including means for amplitude encoding said other values.

27. The apparatus of claim 25 further including means for encoding said first and second runlength code values with a sign value.

28. The apparatus of claim 25 wherein said first values have amplitude zero, said second values have absolute amplitude one, and said other values have absolute amplitudes greater than one whereby said first and second runlength codes values are formed representing the number of consecutive zeros.

29. The apparatus of claim 25 wherein said first values have the highest frequency of occurrence in said digital signals, wherein said second values have the next highest frequency of occurrence in said digital signals, and wherein said other values have the lowest frequency of occurrence in said digital signals.

30. An apparatus for processing input signals to reduce the amount of data utilized to represent the input signals, the apparatus comprising,

means for processing the input signals to form processed signals where the processed signals are digital numbers having first values, second values, and other values,

means for coding each digital number to form statistically coded signals such that the more frequently occurring values in the digital numbers are represented by shorter code lengths and the less frequently occurring values in the digital numbers are represented by longer code lengths, said means for coding including,

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means for forming first runlength code values representing the number of consecutive first values followed by said second value in a digital number,

means for forming second runlength code values representing the number of consecutive first values followed by one of said other values in the digital number.

31. The apparatus of claim 30 wherein said means for coding includes means for amplitude encoding said other values.

32. The apparatus of claim 30 wherein said means for coding includes means for encoding said first and second runlength code values with a sign value.

33. The apparatus of claim 30 wherein said means for processing forms said first values with amplitude zero, forms said second values with absolute amplitude one, and forms said other values with absolute amplitudes greater than one.

34. The apparatus of claim 30 including an addressable table storing runlength code values representing different numbers of consecutive first values followed by said second value, and storing a plurality of second runlength code values representing different numbers of said first values followed by one of said other values, said first runlength code values and said second runlength code values organized in said table such that the statistically more frequently occurring runlength code values in digital numbers are represented by shorter code lengths and the less frequently occurring values in digital numbers are represented by longer code lengths, and wherein

said means for forming first runlength code values includes means for addressing said addressable table with a runlength number representing the runlength of said first value followed by said second value in order to obtain said first runlength code value from said table, and

said means for forming second runlength code values includes means for addressing said addressable table with a runlength number representing the runlength of said first value followed by one of said other values in order to obtain said second runlength code value.

35. The apparatus of claim 30 wherein said means for coding further includes means for providing an end code to designate an end of a digital number.

36. An apparatus for processing digital signals to reduce the amount of data utilized to represent the digital signals, comprising,

means for processing the digital signals to form processed signals where the processed signals are multivalued digital numbers and have first values, second values, . . . ,  $j$ -values,  $(j+1)$ -values, . . . ,  $n$ -values for  $j$  ranging from 1 to  $n$ , and have other values,

means for coding said processed signals to form statistically coded signals such that the more frequently occurring values in the digital numbers are represented by shorter code lengths and the less frequently occurring values in the digital numbers are represented by longer code lengths, said means for coding including,

means for forming  $j^{\text{th}}$  runlength code values representing the number of consecutive processed signals of said first value followed by said  $j+1$  value, for each value of  $j$  from 1 to  $n$ ,

means for forming additional runlength code values representing the number of consecutive pro-

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cessed signals of said first value followed by any of said other values.

37. The apparatus of claim 36 wherein said digital signals represent pixels forming images in sequential frames, said means for processing includes multiple mode processing means for processing said digital signals to form said processed signals, and includes means for forming the mean-square difference,  $d_0$ , between digital signals representing pixels of the current frame and digital signals representing pixels of the previous frame and includes means for forming the mean-square error,  $d_b$ , between the digital signals representing pixels in the present frame and digital signals representing the best matched pixels of the previous frame, said means for processing further including means for comparing the difference,  $d_0 - d_b$ , with a motion threshold  $T_M$ , and means for selecting one of said modes based on said comparison.

38. A method for processing digital signals, where the digital signals have first values, second values and other values, where the processing reduces the amount of data utilized to represent the digital signals and where the processing forms statistically coded signals such that the more frequently occurring values of digital signals are represented by shorter code lengths and the less frequently occurring values of digital signals are represented by longer code lengths, where

a first code value is formed representing a set of said first values followed by said second value,

a second code value is formed representing a set of said first values followed by one or more of said other values

comprising,

decoding said first code value to form a set of said first values followed by said second value,

decoding said second code value to form a set of said first values followed by one or more of said other values.

39. A method for processing digital signals to reduce the amount of data utilized to represent the digital signals, the steps comprising,

processing the digital signals to form processed signals where the processed signals are multivalued digital numbers and have first values, second values, . . . ,  $j$ -values,  $(j+1)$ -values, . . . ,  $n$ -values for  $j$  ranging from 1 to  $n$ , and have other values,

coding said processed signals to form statistically coded signals such that the more frequently occurring values of the processed signals are represented by shorter code lengths and the less frequently occurring values of coded signals are represented by longer code lengths, said coding including,

forming  $j^{\text{th}}$  runlength code values representing the number of consecutive processed signals of said first value followed by said  $j+1$  value, for each value of  $j$  from 1 to  $n$ ,

forming additional runlength code values representing the number of consecutive processed signals of said first value followed by any of said other values

transmitting said  $j^{\text{th}}$  runlength code values and said additional runlength code values to a receiver to form received signal including received  $j^{\text{th}}$  runlength code values and received additional runlength code values,

decoding said received signals to form decoded signals, said decoding including,

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decoding said received  $j^{th}$  runlength code values to form a number of consecutive decoded signals of said first value followed by said  $j+1$  value, for each value of  $j$  from 1 to  $n$ ,

decoding said received additional runlength code values to form a number of consecutive decoded signals of said first value followed by any of said other values.

40. The method of claim 39 wherein said coding step includes the step of amplitude encoding said other values.

41. The method of claim 39 wherein said coding step includes the step of encoding said  $j$  runlength code values with a sign value.

42. An apparatus for processing input signals to reduce the amount of data utilized to represent the input signals, the apparatus comprising,

means for processing the input signals to form processed signals where the processed signals are digital numbers having first values, second values, and other values,

means for coding each digital number to form statistically coded signals such that the more frequently occurring values in the digital numbers are represented by shorter code lengths and the less frequently occurring values in the digital numbers are represented by longer code lengths, said means for coding including,

means for forming first runlength code values representing the number of consecutive first values followed by said second value in a digital number,

means for forming second runlength code values representing the number of consecutive first values followed by one of said other values in the digital number,

means for transmitting said  $j^{th}$  runlength code values and said additional runlength code values to a receiver to form received signal including received  $j^{th}$  runlength code values and received additional runlength code values,

means for decoding said received signals to form decoded signals, said means for decoding including,

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means for decoding said received  $j^{th}$  runlength code values to form a number of consecutive decoded signals of said first value followed by said  $j+1$  value, for each value of  $j$  from 1 to  $n$ ,

means for decoding said received additional runlength code values to form a number of consecutive decoded signals of said first value followed by any of said other values.

43. The apparatus of claim 42 wherein said means for coding includes means for amplitude encoding said other values.

44. The apparatus of claim 42 wherein said means for coding includes means for encoding said first and second runlength code values with a sign value.

45. The apparatus of claim 42 wherein said means for processing forms said first values with amplitude zero, forms said second values with absolute amplitude one, and forms said other values with absolute amplitudes greater than one.

46. The apparatus of claim 42 including an addressable table storing runlength code values representing different numbers of consecutive first values followed by said second value, and storing a plurality of second runlength code values representing different numbers of said first values followed by one of said other values, said first runlength code values and said second runlength code values organized in said table such that the statistically more frequently occurring runlength code values in digital numbers are represented by shorter code lengths and the less frequently occurring values in digital numbers are represented by longer code lengths, and wherein

said means for forming first runlength code values includes means for addressing said addressable table with a runlength number representing the runlength of said first value followed by said second value in order to obtain said first runlength code value from said table, and

said means for forming second runlength code values includes means for addressing said addressable table with a runlength number representing the runlength of said first value followed by one of said other values in order to obtain said second runlength code value.

\* \* \* \* \*

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION

FILED-CLERK  
U.S. DISTRICT COURT  
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Compression Labs, Incorporated, )

*Plaintiff,* )

v. )

1. Agfa Corporation, )

2. Apple Computer, Incorporated, )

3. Axis Communications, Incorporated, )

4. Canon, USA, Incorporated, )

5. Concord Camera Corporation, )

6. Creative Labs, Incorporated, )

7. Eastman Kodak Company, )

8. Fuji Photo Film U.S.A., )

9. Fujitsu Computer Products of America, )

10. Gateway, Incorporated, )

11. Hewlett-Packard Company, )

12. JASC Software, )

13. JVC Americas Corporation, )

14. Kyocera Wireless Corporation, )

15. Macromedia, Incorporated, )

16. Matsushita Electric Corporation of )

America, )

17. Mitsubishi Digital Electronics America, )

Incorporated, )

18. Océ North America, Incorporated, )

19. Onkyo U.S.A. Corporation, )

20. PalmOne, Incorporated, )

21. Panasonic Communications Corporation )

of America, )

22. Panasonic Mobile Communications )

Development Corporation of USA, )

23. Ricoh Corporation, )

24. Riverdeep, Incorporated (d.b.a. )

Broderbund), )

25. Savin Corporation, )

26. Thomson, Incorporated )

27. Xerox Corporation, )

*Defendants.* )

BY \_\_\_\_\_

C.A. No. 2:04cv158

Judge Folsom

JURY

**FIRST AMENDED COMPLAINT**

Compression Labs, Inc. ("CLI") for its Complaint against Defendants alleges as follows:

### **NATURE OF THE ACTION**

1. This is a patent infringement action to stop each Defendant's unauthorized and infringing sale, offers to sell, use and importation of products incorporating CLI's patented technology. CLI seeks injunctive relief to stop Defendants from continuing to infringe CLI's valuable patent rights, as well as monetary damages.

### **THE PARTIES**

2. Plaintiff, CLI, is a corporation existing and organized under the laws of Delaware and has its principal place of business at 108 Wild Basin Drive, Austin, TX 78746.

3. Defendant Agfa Corporation is a corporation existing and organized under the laws of Delaware and has its principal place of business at 100 Challenger Road, Ridgefield Park, NJ 07660.

4. Defendant Apple Computer, Incorporated is a corporation existing and organized under the laws of California and has its principal place of business at 1 Infinite Loop, Cupertino, CA 95014.

5. Defendant Axis Communications, Incorporated is a corporation existing and organized under the laws of Massachusetts and has its principal place of business at 100 Apollo Drive, Chelmsford, MA 01824.

6. Defendant Canon, U.S.A., Incorporated is a corporation existing and organized under the laws of New York and has its principal place of business at One Canon Plaza, Lake Success, New York, NY 11042.

7. Defendant Concord Camera Corporation is a corporation existing and organized under the laws of New Jersey and has its principal place of business at 4000 Hollywood Boulevard, Suite 650N, Hollywood, FL 33021.

8. Defendant Creative Labs, Incorporated is a corporation existing and organized under the laws of California and has its principal place of business at 1901 McCarthy Boulevard, Milpitas, CA 95035.

9. Defendant Eastman Kodak Company is a corporation existing and organized under the laws of New Jersey and has its principal place of business at 343 State Street, Rochester, NY 14650.

10. Defendant Fuji Photo Film U.S.A. is a corporation existing and organized under the laws of New York and has a place of business at 200 Summit Lake Drive, Valhalla, NY 10595.

11. Defendant Fujitsu Computer Products of America is a corporation existing and organized under the laws of California and has its principal place of business at 2904 Orchard Parkway, San Jose, CA 95134.

12. Defendant Gateway, Incorporated is a corporation existing and organized under the laws of Delaware and has its principal place of business at 14303 Gateway Place, Poway, CA 92064.

13. Defendant Hewlett-Packard Company is a corporation existing and organized under the laws of Delaware and has its principal place of business at 3000 Hanover Street, Palo Alto, CA 94304.

14. Defendant JASC Software is a corporation existing and organized under the laws of Minnesota and has its principal place of business at 7905 Fuller Road, Eden Prairie, MN 55344.

15. Defendant JVC Americas Corporation is a corporation existing and organized under the laws of Delaware and has its principal place of business at 1700 Valley Road, Suite 1, Wayne, NJ 07470.

16. Defendant Kyocera Wireless Corporation is a corporation existing and organized under the laws of Delaware and has its principal place of business at 10300 Campus Point Drive, San Diego, CA 92121.

17. Defendant Macromedia, Incorporated is a corporation existing and organized under the laws of Delaware and has its principal place of business at 600 Townsend Street, San Francisco, CA 94103.



18. Defendant Matsushita Electric Corporation of America is a corporation existing and organized under the laws of Delaware and has its principal place of business at 1 Panasonic Way, Secaucus, NJ 07094.

19. Defendant Mitsubishi Digital Electronics America, Incorporated is a corporation existing and organized under the laws of Delaware and has its principal place of business at 9351 Jeronimo Road, Irvine, CA 92618.

20. Defendant Océ North America, Incorporated is a corporation existing and organized under the laws of Delaware and has its principal place of business at 5450 North Cumberland Avenue, Chicago, IL 60656.

21. Defendant Onkyo U.S.A. Corporation is a corporation existing and organized under the laws of New Jersey and has its principal place of business at 18 Parkway, Upper Saddle River, NJ 07458.

22. Defendant PalmOne, Incorporated is a corporation existing and organized under the laws of Delaware and has its principal place of business at 400 North McCarthy Boulevard, Milpitas, CA 95035.

23. Defendant Panasonic Communications Corporation of America is a corporation existing and organized under the laws of Delaware and has its principal place of business at 7625 Panasonic Way, San Diego, CA 92154.

24. Defendant Panasonic Mobile Communications Development Corporation of USA is a corporation existing and organized under the laws of Delaware and has its principal place of business at 1225 Northbrook Parkway, Suite 2-352, Suwanee, GA 30024.

25. Defendant Ricoh Corporation is a corporation existing and organized under the laws of Delaware and has its principal place of business at 5 Dedrick Place, West Caldwell, NJ 07006.

26. Defendant Riverdeep, Incorporated (d.b.a. Broderbund) is a corporation existing and organized under the laws of Delaware and has its principal place of business at 500 Redwood Boulevard, Novato, CA 94947.

27. Defendant Savin Corporation is a corporation existing and organized under the laws of Delaware and has its principal place of business at 333 Ludlow Street, Stamford, CT 06902.

28. Defendant Thomson, Incorporated is a corporation existing and organized under the laws of Delaware and has its principal place of business at 10330 North Meridian Street, Indianapolis, IN 46290.

29. Defendant Xerox Corporation is a corporation existing and organized under the laws of New York and has its principal place of business at 800 Long Ridge Road, Stamford, CT 06904.

#### **JURISDICTION AND VENUE**

30. This action for patent infringement arises under the Patent Laws of the United States, 35 U.S.C. §§ 1 et seq., and in particular 35 U.S.C. §§ 271, 281, 283, 284 and 285. This Court has jurisdiction over the subject matter of this action under 28 U.S.C. 1338(a).

31. This Court has personal jurisdiction over each of the Defendants and venue is proper in this Court pursuant to 28 U.S.C. §§ 1391 and 1400.

#### **COUNT 1 – PATENT INFRINGEMENT**

32. This case involves technology used to process digital signals. CLI owns patents relating to such technology, and CLI invested substantial amounts in related research and development.

33. United States Patent No. 4,698,672 entitled “Coding System for Reducing Redundancy” (hereinafter “the ‘672 patent”), was duly and legally issued on October 6, 1987. CLI is an owner of the ‘672 patent and, pursuant to an agreement with its co-owner, has the exclusive rights to sue and recover for infringement thereof with respect to the Accused Devices, as hereinafter defined. A copy of the ‘672 patent is attached as Exhibit A.

34. Defendants offer to sell, sell, use, and/or import into the United States devices, at least portions of which are designed to be at least partly compliant with the JPEG standard as defined by CCITT Recommendation T.81 approved on September 18, 1992, entitled

“Information Technology—Digital Compression and Coding of Continuous Tone Still Images—Requirements and Guidelines,” the identical text of which is also published as ISO/IEC International Standard 10918-1, or with any version or variance thereof defining a lossy compression scheme (hereinafter referred to as “the Accused Devices”). The Accused Devices are covered by, and carry out methods that are covered by, one or more claims of the ‘672 patent.

35. Through their actions including offering to sell, selling, using and importing the Accused Devices, Defendants have infringed the aforementioned patent and actively induced others to infringe and contributed to the infringement by others of the ‘672 patent in the United States, including within the jurisdiction of this Court. Certain of the Defendants also have made the Accused Devices in the United States, and such Defendants have also infringed the aforementioned patent by their actions in this regard.

36. CLI is likely to be irreparably harmed by Defendants’ infringement, inducement of others to infringe, and contributory infringement of the ‘672 patent. CLI has no adequate remedy at law.

WHEREFORE, CLI prays for judgment that:

A. United States Patent No. 4,698,672 has been infringed, directly, by inducement, and/or contributorily, by each Defendant;

B. Each Defendant, its officers, agents, servants and employees, and those persons in active concert and participation with any of them, be permanently enjoined from the direct or contributory infringement of, and from inducing others to infringe, United States Patent No. 4,698,672;

C. CLI be awarded damages sufficient to compensate it for each Defendant’s infringement, contributory infringement and inducement of others to infringe, that such damages

be increased to three times the amount found or assessed pursuant to 35 U.S.C. § 284, and that such damages be awarded to CLI with prejudgment interest;

D. That this case be declared exceptional pursuant to 35 U.S.C. § 284 and that CLI be awarded its attorney fees, costs and expenses in this action; and

E. CLI be awarded such other and further relief as the Court may deem just.

CLI DEMANDS A TRIAL BY JURY.

Respectfully submitted,  
Compression Labs, Inc.

Dated: June 21, 2004

By: Stephen G. Rudisill by SCC by PERMIA  
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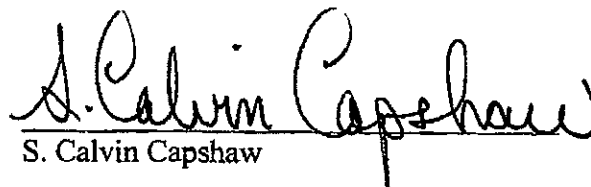
**CERTIFICATE OF SERVICE**

I hereby certify that on the 21st day of June, 2004, a true and correct copy of the foregoing FIRST AMENDED COMPLAINT was deposited in the United States Mail, postage prepaid, and addressed to the following counsel of record:

<u>Adobe Systems, Incorporated</u> Robert T. Halsam Heller Ehrman White & McAuliffe LLP 275 Middlefield Road Menlo Park, California 94025-3506	<u>Creative Labs, Incorporated</u> Attention: Legal Department 1901 McCarthy Boulevard Milpitas, California 95035
<u>Agfa Corporation</u> Attention: Legal Department 100 Challenger Road Ridgefield Park, New Jersey 07660	<u>Eastman Kodak Company</u> Nicholas H. Patton Robert W. Schroeder, III Patton, Tidwell & Schroeder, LLP 4605 Texas Boulevard P.O. Box 5398 Texarkana, Texas 75505
<u>Apple Computer Incorporated</u> Herschel Tracy Crawford Eric H. Findlay Ramey & Flock 100 East Ferguson, Suite 500 Tyler, Texas 75702	<u>Fuji Photo Film U.S.A.</u> Attention: Legal Department 200 Summit Lake Drive Valhalla, New York 10595
<u>Axis Communications, Incorporated</u> Barry W. Graham Finnegan, Henderson, Farabow, Garrett & Dunner, L.L.P. 1300 I Street, N.W. Washington, D.C. 20005-3315	<u>Fujitsu Computer Products of America</u> Michael M. Murray Christopher Chalsen Milbank, Tweed, Hadley & McCloy LLP 1 Chase Manhattan Plaza New York, New York 10005-1413
<u>Canon U.S.A., Incorporated</u> Attention: Legal Department One Canon Plaza, Lake Success New York, New York 10042	<u>Gateway, Incorporated</u> W. Bryan Farney Darryl J. Adams Dewey Ballantine LLP 401 Congress Avenue Suite 3200 Austin, Texas 78701-2478
<u>Concord Camera Corporation</u> Kerry Sisselman 400 Hollywood Boulevard Suite 659 North Hollywood, Florida 33021	<u>Hewlett-Packard Company</u> Sean C. Cunningham Bruce Watrous Gray Cary Ware & Freidenrich LLP 401 B Street, Suite 2000 San Diego, CA 92101-4240

<p><u>JASC Software</u> Deakin T. Lauer Merchant &amp; Gould PC 3200 IDS Center 80 South Eighth Street Minneapolis, Minneapolis 55402</p> <p>Franklin A. Poff, Jr. Crisp, Boyd &amp; Poff, LLP 2301 Moores Lane P.O. Box 6297 Texarkana, Texas 75505</p>	<p><u>Matsushita Electric Corporation of America</u> Morton Amster Abraham Kasdan Joseph Casino Amster, Rothstein &amp; Ebenstein, LLP 90 Park Avenue New York, New York 10016</p> <p>Eric M. Albritton Albritton Law Firm P.O. Box 2649 Longview, Texas 75606-2649</p>
<p><u>JVC Americas Corporation</u> Attention: Legal Department 1700 Valley Road, Suite 1 Wayne, New Jersey 07470</p>	<p><u>Mitsubishi Digital Electronics America, Incorporated</u> Attention: Legal Department 9351 Jeronimo Road Irvine, California 92618</p>
<p><u>Kyocera Wireless Corporation</u> Jennifer P. Ainsworth Wilson, Sheehy, Knowles, Robertson &amp; Cornelius, P.C. 315 East Fifth Street Tyler, Texas 75701</p>	<p><u>Oce North America, Incorporated</u> Frederick H. Colen Reed Smith LLP 435 Sixth Avenue Pittsburgh, PA 15219</p> <p>Clyde Siebman Siebman Reynolds Burg &amp; Phillips, LLP Federal Courthouse Square 300 N. Travis St. Sherman, Texas 75090</p>
<p><u>Macromedia Incorporated</u> Charlene Morrow Fenwick &amp; West LLP 801 California Street Mountainview, California 94041</p> <p>Harry Lee Gillam, Jr. Melissa Smith Gillam &amp; Smith LLP 110 South Bolivar Street Suite 204 Marshall, Texas 75670</p>	<p><u>Onkyo USA Corporation</u> Robert F. Zielinski Wolf, Block, Schorr and Solis-Cohen LLP 1650 Arch Street, 22<sup>nd</sup> Floor Philadelphia, Pennsylvania 19103</p> <p>Barry J. Bendes Wolf, Block, Schorr and Solis-Cohen LLP 250 Park Avenue New York, New York 10177</p>

<p><u>PalmOne, Incorporated</u>                  Attention: Legal Department                  400 North McCarthy Boulevard                  Milpitas, California 95035</p>	<p><u>Savin Corporation</u>                  Attention: Legal Department                  333 Ludlow Street                  Stamford, Connecticut 06902</p>
<p><u>Panasonic Communications Corporation of America/ Panasonic Mobile Communications Development Corporation of U.S.A.</u>                  Morton Amster                  Abraham Kasdan                  Joseph Casino                  Amster, Rothstein &amp; Ebenstein, LLP                  90 Park Avenue                  New York, New York 10016</p> <p>Eric M. Albritton                  Albritton Law Firm                  P.O. Box 2649                  Longview, Texas 75606-2649</p>	<p><u>Thomson, Incorporated</u>                  Attention: Legal Department                  10330 North Meridian Street                  Indianapolis, Indiana 46290</p>
<p><u>Ricoh Corporation</u>                  Attention: Legal Department                  5 Dedrick Place                  West Caldwell, New Jersey 07006</p>	<p><u>Xerox Corporation</u>                  Attention: Legal Department                  800 Long Ridge Road                  Stamford, Connecticut 06904</p>
<p><u>Riverdeep, Incorporated (d.b.a. Broderbund)</u>                  Attention: Legal Department                  500 Redwood Boulevard                  Novato, California 94947</p>	

  
 S. Calvin Capshaw



JS 44 (Rev. 3/99) *Jmo. Jm. 102858* **CIVIL COVER SHEET** *Tgw*

The JS-44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON THE REVERSE OF THE FORM.)

**I. (a) PLAINTIFFS**

COMPRESSION LABS, INC.

(b) County of Residence of First \_\_\_\_\_  
(EXCEPT IN U.S. PLAINTIFF CASES)

**DEFENDANTS** *2:04-cv-159*

(1) DELL INCORPORATED, ET AL.

County of Residence of First Listed \_\_\_\_\_  
(IN U.S. PLAINTIFF CASES ONLY)

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE LAND INVOLVED.

**(c) Attorney's (Firm Name, Address, and Telephone Number)**

JENKENS & GILCHRIST  
225 West Washington Street, Suite 2600  
Chicago, IL 60606  
(312) 425-3900

Attorneys (If Known)

**II. BASIS OF JURISDICTION** (Place an "X" in One Box Only)

- 1 U.S. Government Plaintiff
- 2 U.S. Government Defendant
- 3 Federal Question (U.S. Government Not a Party)
- 4 Diversity (Indicate Citizenship of Parties in Item III)

**III. CITIZENSHIP OF PRINCIPAL PARTIES** (Place an "X" in One Box for Plaintiff and One Box for Defendant)

- |   |                            |                            |   |                            |                            |
|---|----------------------------|----------------------------|---|----------------------------|----------------------------|
| Citizen of This State                   | <input type="checkbox"/> 1 | <input type="checkbox"/> 1 | Incorporated or Principal Place of Business In This State     | <input type="checkbox"/> 4 | <input type="checkbox"/> 4 |
| Citizen of Another State                | <input type="checkbox"/> 2 | <input type="checkbox"/> 2 | Incorporated and Principal Place of Business In Another State | <input type="checkbox"/> 5 | <input type="checkbox"/> 5 |
| Citizen or Subject of a Foreign Country | <input type="checkbox"/> 3 | <input type="checkbox"/> 3 | Foreign Nation  | <input type="checkbox"/> 6 | <input type="checkbox"/> 6 |

**IV. NATURE OF SUIT** (Place an "X" in One Box Only)

CONTRACT	TORTS	FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES	
<input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excl. Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability	<b>PERSONAL INJURY</b> <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Federal Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury	<b>PERSONAL INJURY</b> <input type="checkbox"/> 362 Personal Injury—Med. Malpractice <input type="checkbox"/> 365 Personal Injury — Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability <b>PERSONAL PROPERTY</b> <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability	<input type="checkbox"/> 610 Agriculture <input type="checkbox"/> 620 Other Food & Drug <input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 630 Liquor Laws <input type="checkbox"/> 640 R.R. & Truck <input type="checkbox"/> 650 Airline Regs. <input type="checkbox"/> 660 Occupational Safety/Health <input type="checkbox"/> 690 Other	<input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 <b>PROPERTY RIGHTS</b> <input type="checkbox"/> 820 Copyrights <input checked="" type="checkbox"/> 830 Patent <input type="checkbox"/> 840 Trademark	<input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce/ICC Rates/etc. <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input type="checkbox"/> 810 Selective Service <input type="checkbox"/> 850 Securities/Commodities/Exchange <input type="checkbox"/> 875 Customer Challenge 12 USC 3410 <input type="checkbox"/> 891 Agricultural Acts <input type="checkbox"/> 892 Economic Stabilization Act <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 894 Energy Allocation Act <input type="checkbox"/> 895 Freedom of Information Act <input type="checkbox"/> 900 Appeal of Fee Determination Under Equal Access to Justice <input type="checkbox"/> 950 Constitutionality of State Statutes <input type="checkbox"/> 890 Other Statutory Actions
<b>REAL PROPERTY</b> <input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property	<b>CIVIL RIGHTS</b> <input type="checkbox"/> 441 Voting <input type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 444 Welfare <input type="checkbox"/> 440 Other Civil Rights	<b>PRISONER PETITIONS</b> <input type="checkbox"/> 510 Motions to Vacate Sentence Habeas Corpus: <input type="checkbox"/> 530 General <input type="checkbox"/> 535 Death Penalty <input type="checkbox"/> 540 Mandamus & Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition	<b>LABOR</b> <input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Mgmt. Relations <input type="checkbox"/> 730 Labor/Mgmt. Reporting & Disclosure Act <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Empl. Ret. Inc. Security Act	<b>SOCIAL SECURITY</b> <input type="checkbox"/> 861 HIA (1395B) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g)) <b>FEDERAL TAX SUITS</b> <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS—Third Party 26 USC 7609	

**V. ORIGIN** (PLACE AN "X" IN ONE BOX ONLY)

- 1 Original Proceeding
- 2 Removed from State Court
- 3 Remanded from Appellate Court
- 4 Reinstated or Reopened
- 5 Transferred from another district (specify)
- 6 Multidistrict Litigation
- 7 Appeal to District Judge from Magistrate Judgment

**VI. CAUSE OF ACTION** (Cite the U.S. Civil Statute under which you are filing and write brief statement of cause. Do not cite jurisdictional statutes unless diversity.)

35 U.S.C. § 1 et seq.

**VII. REQUESTED IN COMPLAINT:**  CHECK IF THIS IS A CLASS ACTION UNDER F.R.C.P. 23 **DEMAND \$** \_\_\_\_\_ **CHECK YES only if demanded in complaint:**  
**JURY DEMAND:**  Yes  No

**VIII. RELATED CASE(S) IF ANY** (See instructions): \_\_\_\_\_ **JUDGE** \_\_\_\_\_ **DOCKET NUMBER** *2:04cv 158*

DATE *4/22/04* SIGNATURE OF ATTORNEY OF RECORD *Stephen G. Rudwill*



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| <input type="checkbox"/> |  | <p><a href="#">CANON - PowerShot G5 Digital Camera</a></p> <p>TFT, 4x Optical / 4x Digital Zoom, 5.0 MP CCD, 1.8-inch LCD, 32 MB CF Card, 14.5 Oz<br/>Dell Part #: A0127629   Dell Manufacturer #: 8398A001</p> <p>Within 24 Hours</p>                          | <p><b>\$599.00</b></p> <p>+ Save \$89.85 instantly</p> <p>To view discounted price, add to cart.</p>  |
| <input type="checkbox"/> |  | <p><a href="#">CANON - EOS-1Ds Digital Camera</a></p> <p>TFT, 4064x2704 Pixels, 11.1 MP CMOS, 2-inch LCD, 44.6 Oz, Includes Interface Cable<br/>Dell Part #: A0130450   Dell Manufacturer #: 8068A008</p> <p>Within 24 Hours</p>                                | <p><b>\$7,999.00</b></p>  |
| <input type="checkbox"/> |  | <p><a href="#">CANON - PowerShot A60 Digital Camera</a></p> <p>TFT, 3X Optical/2.5X Digital Zoom, 1600x1200 Pixels, 2.0 MP CCD, 1.5-inch LCD, 16 MB CF Card, 7.6 Oz<br/>Dell Part #: A0097951   Dell Manufacturer #: 8401A001</p> <p>5-7 Days</p>               | <p><b>\$188.95</b></p> <p><b>\$160.61</b></p> <p>[You Save \$28.34]</p>                               |
| <input type="checkbox"/> |  | <p><a href="#">CANON - PowerShot S1 IS Digital Camera</a></p> <p>10X Optical/3.2X Digital Zoom, Up to 2048x1536 Pixels, 3.3 MP CCD, 1.5-inch TFT Color LCD, Built-in Flash<br/>Dell Part #: A0293114   Dell Manufacturer #: 9179A001</p> <p>Within 24 Hours</p> | <p><b>\$499.00</b></p> <p>+ Save \$74.85 instantly</p> <p>To view discounted</p>                      |

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▶ **CANON - PowerShot S410 Digital Camera**  
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