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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

SQUARE D COMPANY
GROUPE SCHNEIDER

ELECTRICAL DISTRIBUTION BUSINESS

3201 NICHOLASVILLE ROAD, LEXINGTON, KY 40503 606-245-7900

November 30, 1992

Federal Communications Commission
1919 M Street, N. W.
Washington, D. C. 20554

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FCC - MAIL ROOM

Sub: Ownership of in Home Cabling
MM Docket No. 92-111

Gentlemen,

Square D is a manufacturer of audio/video/telephone products that are installed in new and existing residential applications. These products are installed by trained installers and includes the installation of coax, telephone and audio wiring. The homeowner or builder pays for the material and installation which are included in the mortgage on the purchase of a new home.

The video products include an RF signal distribution subsystem that employs series 6 coax, passive splitters, and a 550 Mhz amplifier. Numerous cable operators across the country have agreed to connect to this prewired in-home cabling system.

We feel since the homeowner bears the expense of the installation and it is permanently embedded in the structure, the homeowner obviously owns the system. This applies universally whether our system is installed or the builder has specified the home be prewired for cable tv, telephone and electrical.

It is our opinion that in other installations where the cable operator has installed the coax, it is not in the best interest of the operator to claim ownership of the in-home cabling system. Removable hardware such as converters and remotes have already been covered by a signed agreement between the operator and homeowner when the service is initiated.

Other service providers that compete with the cable industry will find a way to use the coax system regardless if the operator claims ownership.

Many homeowners are technically competent enough to move their converter from room to room and add components to their system that are readily available from many retail outlets. Because of this the cable operator should be relieved of the liability of signal leakage issues when they arise and should be permitted to resolve these with the homeowner.

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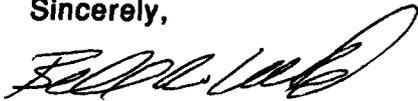
We Respond 2

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I believe it is more appropriate to discuss establishing a demarcation point at the house, which would make this matter less subject to controversy as to where the operator's responsibility ends. With a 6db requirement at the end of a 100 foot length of coax past the ground block on the house, the homeowner will have adequate signal to power at least two televisions and maybe a VCR. For any signal level requirement above that, the homeowner needs to be educated to contact the operator or a competent installer of an in-home system.

Thank you for the opportunity to comment on this subject.

Sincerely,

A handwritten signature in black ink, appearing to read "Bill R. Unseld", written in a cursive style.

Bill R. Unseld
Manager, Product Development