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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC

In the Matter of)
)
Implementation of Section 17 of the)
Cable Television Consumer Protection)
and Competition Act of 1992)
)
Compatibility between Cable Systems)
and Consumer Electronics Equipment)

ET Docket No. 93-7

Comments of General Instrument Corporation

General Instrument Corporation submits these comments in support of the Supplemental Comments of the Cable-Consumer Electronics Compatibility Advisory Group ("C3AG").¹

General Instrument Corporation ("GIC") is a world leading manufacturer of cable communications equipment for CATV applications, including subscriber equipment such as addressable converters and descramblers; headend equipment for modulation, signal processing and scrambling; and distribution equipment such as fiber optic cable, coaxial cable and RF distribution amplifiers and filters.

GIC pioneered the development of digital video compression technologies and plans to begin supplying such equipment to the cable television industry in the near future. The company has

¹Comments were requested in Public Notice DA 93-954, released July 26, 1993

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announced plans to incorporate, in cable television subscriber equipment, computing power equivalent to that of a personal computer.

GIC is currently supplying digital video compression equipment to the satellite programming industry, and is a leading manufacturer and supplier of encryption equipment for the home satellite television market. GIC is also a proponent of two all-digital high definition television systems which have been under consideration as the advanced television broadcast standard and, in May of this year, joined with other all-digital proponents in a Grand Alliance to build a unified system for consideration as the U.S. standard.

As a member of C3AG, GIC believes that significant progress has been made in establishing the means to assure compatibility between television receivers, video recorders and cable systems. The commitment of the cable industry to address the installed base of consumer electronics equipment, and the commitment of both industries to work together to address future "cable ready" products (both analog and digital television), will offer consumers the advantages of cable programming and preserve the functions of their consumer electronics products.

The short term measures proposed by C3AG will afford consumers the ability to

- record sequentially programs on two different scrambled channels,
- watch one scrambled program while recording another, and
- enjoy the advanced television picture generation and display features.

Consumers will be able to employ these measures with the television receivers and video recorders now in their homes.

The longer term measures proposed by C3AG include the definition of the term "cable-ready," coordination of the evolution of channel plans, and development of a standard decoder interface. These will provide future enhancements in ease of use, and will afford cost savings to consumers.

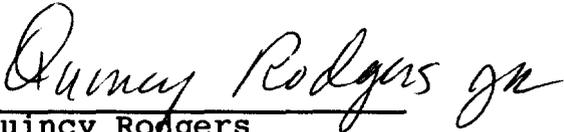
As the C3AG Supplemental Comments point out, the cable industry must be free to innovate. It must be able to develop and test new services and technologies, prior to the adoption of standards.² This innovation process serves the public interest and is consistent with Section 7 of the Communications Act of 1934, as amended. "It shall be the policy of the United States to encourage the provision of new technologies and services to the public." 47 USC 157. Moreover, the cable television

²While standardization is important for future compatibility, it is essential that the standards process not restrain the ability of the industry to innovate in the development of new technologies and services.

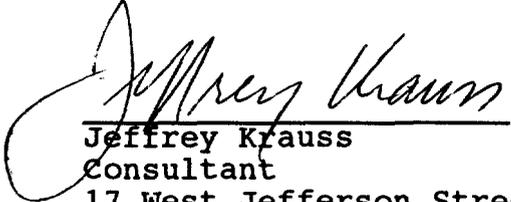
industry has been a marketplace leader in the development of new services and technologies.

GIC believes that the compromise proposals, developed between the cable and consumer electronics industries, will serve the public interest by meeting consumer needs and establishing a process for further progress.

Respectfully submitted,


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