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FEDERAL COMMUNICATIONS COMMISSION
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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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

American Telephone and Telegraph Company ("AT&T") respectfully submits the following comments in response to the Commission's Notice of Proposed Rulemaking ("NPRM"), FCC 93-495, released December 1, 1993.

As mandated by Section 17 of the 1992 Cable Act,¹ the NPRM proposes requirements for existing cable television systems to mitigate incompatibilities between such systems and consumers' television sets and VCRs. The NPRM also proposes additional compatability requirements, effective January 1, 1997, for new consumer electronics and new or rebuilt cable systems.

Although AT&T does not object to the substance of the proposed rules for existing technology, AT&T urges that

¹ Cable Television Consumer Protection and Competition Act of 1992, Pub. L. No. 102-385, 106 Stat. 1460, § 17.

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any regulations adopted in this proceeding be applied only to today's analog television environment (i.e., one-way video programming). This will assure that the rules do not inadvertently constrain the development of interfaces and standards for future technologies, which will see increasing convergence of digital video, telecommunications, computing, and other types of information processing in the home.

Confining the rules to current technology is consistent with the statutory deadline. That approach is also warranted by the fact that neither the amended EIA/IS-6 channel identification plan being prepared by the Joint Engineering Committee (JEC) nor the new hybrid analog/digital Decoder Interface standard being prepared by the Cable-Consumer Electronics Advisory Group (CAG) -- both important components of the proposed new rules for equipment manufactured after December 31, 1996 -- is yet available for public comment.² Thus, rules adopted for new technology at this time might not "provide the flexibility needed to ensure compatibility through the transition . . . to the new digital systems" (NPRM, ¶ 18).

Moreover, exploration of standards and interface issues should not be limited to relationships between consumer electronics and cable television systems. Such a

² The NPRM states (¶ 28) that the proposed December 31, 1996, cut-over date is based on the expected completion of those standards by the end of 1993.

limited approach would require the Commission to re-visit these issues pertaining to broadband communications technologies such as satellite, ISDN, ADSL and the like, access to broadband services provided by local exchange companies, and two-way communications such as interactive television. The public interest would be better served by considering simultaneously the possible synergies among consumer electronics, emerging information appliances, cable systems, and these technologies.³

Consumers will obtain the benefits promised by the convergence of voice, video and data communications only if suppliers have the opportunity to compete in an environment of fairly-set interfaces and standards. Therefore, AT&T proposes that the Commission issue a broad-ranging Notice of Inquiry addressed to interfaces among equipment in the home and to transmission and information processing standards for future digital multimedia products and services. That Inquiry should seek comment on the circumstances in which Commission mandated standards are needed. The Inquiry should also seek comment on what Commission initiatives and regulations would afford consumers the greatest choice and permit providers to succeed on the merits of their offerings

³ For example, it would appear to disserve consumer interests if there were to develop a multiplicity of interface boxes for different communications services.

rather than by control of totally closed systems and interfaces.

CONCLUSION

The Commission should adopt rules in this proceeding that apply only to the current analog technology that is the subject of the April, 1994 statutory deadline, and should issue a Notice of Inquiry addressed to the broader issues of future technology identified in these Comments.

Respectfully Submitted,

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