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Before the
Federal Communications Commission
Washington, D. C. 20554

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JAN 25 1994

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

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 THE
UNITED STATES TELEPHONE ASSOCIATION**

The United States Telephone Association (USTA) respectfully submits its comments in the above-referenced proceeding. USTA is the principal trade association of the exchange carrier industry. Its members provide over 98 percent of the exchange carrier-provided access lines in the U. S. USTA has participated in this proceeding since its inception.

In its previous filings in this docket, USTA has urged the Commission to thoroughly assess the current and emerging technology environment to assure that the Commission's efforts to comply with the requirements of section 17 of the Cable Television Consumer Protection and Competition Act of 1992 have a procompetitive and open result and encourage the development of new technologies. In order to accommodate the rapidly evolving video marketplace, USTA recommended that the Commission expand the scope of participants in any standards-setting or advisory capacity to include others within the marketplace, including

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wireless cable providers, video dialtone network providers and providers of optical fiber options. This viewpoint was shared by a number of other commenters.

While this issue was not raised in the Notice of Proposed Rulemaking, USTA continues to urge the Commission to consult with many interested entities beyond the traditional cable television and manufacturing communities to ensure that the interests of all multi-channel video programming distributors are represented. Such consultation is imperative given the changes in system capacity, the movement to digital delivery, video compression and the deployment of fiber.

The Commission should clarify that the proposed standards apply to analog cable services. As the Commission begins to consider standards for digitally transmitted video service, it should seek counsel from a wider range of interests to consider standards and to explore interfaces which will cover a broad range of video applications.

Any requirement for delivery of a basic tier of channels in the clear should also apply only to analog cable services. Currently, video signals delivered in digital format must be converted to analog format by means of a set top decoder, in order to permit the signal to be viewed on an analog television set. Digital video systems therefore cannot deliver a basic tier of channels directly to the television, bypassing the set top decoder.

USTA strongly encourages the Commission to address the issue raised herein to encourage competition in the video service marketplace and to accommodate the introduction of new technologies.

Respectfully submitted,

UNITED STATES TELEPHONE ASSOCIATION

By: *Linda Kent*

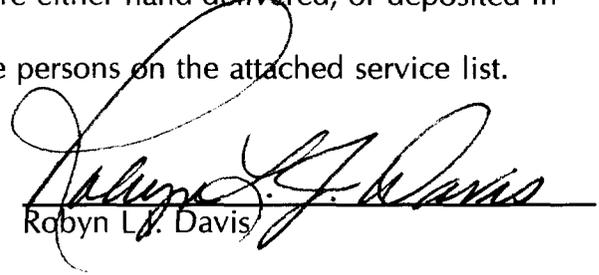
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January 25, 1994

CERTIFICATE OF SERVICE

I, Robyn L.J. Davis, do certify that on January 25, 1994 copies of the Comments of the United States Telephone Association were either hand-delivered, or deposited in the U.S. Mail, first-class, postage prepaid to the persons on the attached service list.


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