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BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

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

REPLY COMMENTS OF MEDIA GENERAL
CABLE OF FAIRFAX COUNTY, INC.

Media General Cable of Fairfax County, Inc. ("Media General") submits these reply comments to amplify its position on one of the two issues addressed in its initial comments in this proceeding.

In its initial comments Media General addressed the subject of the Commission's proposed requirement that cable operators notify their subscribers "of sources where [system-compatible remote units] can be obtained in the local area." Notice of Proposed Rulemaking, ET Docket No. 93-7, slip op. at 8, ¶ 16. Media General said this:

Of course, to make all of this work, both sellers and potential buyers of remotes must know what gear is compatible with the set-top unit in use. Media General has absolutely no objection to providing this information by publishing it to its subscribers and providing it on request to potential sellers.

Comments of Media General Cable of Fairfax County, Inc., 7.

The comments of other parties have made us aware that there is a much broader universe of compatible remotes than

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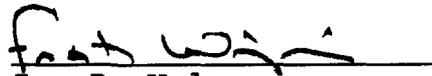
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Media General earlier recognized and that even the undertaking of identifying all compatible remote equipment on a current basis is likely to lead to under-inclusive disclosure. We therefore endorse the conclusion advanced in the Comments of the Cable-Consumer Electronics Compatibility Advisory Group (the "CAG Comments") "that consumers be provided with information regarding the 'types,' not 'models,' of compatible remotes." Id., 7 (footnote omitted).

As the CAG Comments attest, there are now so many models of these devices on the market that the magnitude of existing consumer choices makes the assembly of a complete and currently accurate list of models impossible. The dissemination of outdated (or under-inclusive) information concerning compatible remote equipment would disserve the interests of both consumers, who might be led to forego attractive alternatives omitted from the list (even if only because the equipment was not on the market when the list was compiled), and equipment manufacturers (for much the same reason). As Media General argued with regard to providing subscribers with a list of local outlets at which compatible remote equipment could be purchased, market mechanisms for the dissemination of information concerning compatible remotes are much more likely to succeed in delivering up-to-the-minute information into the hands of subscribers.

Media General has no objection in identifying for its subscribers the types of decoders used in its system, although it seems unnecessary, as the identity of his or her own set-top unit will be immediately known to every subscriber. We caution, however, that there would be some danger of confusion even in this type of publisher identification, since Media General uses more than one brand of decoder, and the customer will, in any event, have to verify which of the listed brands is in his or her home. It may be simpler, and less likely to confuse subscribers, for a cable operator to publish a statement that compatible remote units exist and to advise what the subscriber needs to tell commercial sales outlets carrying remote units in order to be certain that what the consumer purchases will indeed be compatible with the set-top unit in his or her home.

Respectfully submitted,



Ian D. Volner
N. Frank Wiggins

Venable, Baetjer, Howard
& Civiletti
1201 New York Avenue, N.W.
Washington, DC 20005
202/962-4800

Counsel to Media General
Cable of Fairfax County, Inc.

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