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October 7, 1994

William F. Caton  
Acting Secretary  
Federal Communications Commission  
1919 M Street, N.W., Room 222  
Washington, D.C. 20554

Re: ET Docket No. 93-7 -- Ex Parte Presentation

Dear Mr. Caton:

On Thursday, October 6, 1994, representatives of the Consumer Electronics Group of the Electronic Industries Association ("EIA/CEG") made an ex parte presentation to Jill Lockett of Commissioner Rachelle B. Chong's office regarding the issues raised by the petitions for reconsideration in the above-referenced proceeding. Representing EIA/CEG were Barbara N. McLennan, James E. Bonan, and the undersigned. The views expressed on behalf of EIA/CEG are reflected in the Association's filings in this proceeding, as well as in the attached outline.

Please let us know if you have any questions.

Sincerely,



Joseph P. Markoski

/jef

Enclosure

cc: Jill Lockett

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**Ex Parte Presentation  
of the Consumer Electronics Group of  
the Electronic Industries Association  
ET Docket No. 93-7**

**I. The Commission Should Require Cable Operators to Provide Security-Only Decoder Modules to All Subscribers Who Request Them.**

- The bundling of security and non-security functions will frustrate the Commission's goal of a competitive market for set-back equipment.
- Functions other than signal security should be provided by competitively supplied equipment.

**II. The Commission Should Eliminate the Requirement That Television Receivers Which Are Not "Cable Ready" Be Labelled as Such.**

- There is no statutory basis for negative labelling.
- Compatibility problems are created by cable systems, not consumer electronics.

**III. The Commission Should Delay the Effective Date of the Restriction on the Use of the Terms "Cable Ready" and "Cable Compatible" in the Marketing of Television Receivers From October 31, 1994 to June 30, 1995.**

- Marketing materials are generally prepared and printed for an entire model year -- July 1 to June 30.
- The cost of destroying existing, and creating new, marketing materials would exceed \$4,000,000.
- The rules should permit factual statements about the capabilities of television receivers and make allowances for Canadian labelling requirements.

**IV. The Commission Should Prohibit "Channel Mapping" by Cable Operators Except Where the Practice Can Be Shown to Be Technically Necessary.**

- Channel mapping perpetuates the need for set-top boxes, even for "cable compatible" receivers.
- Waivers can address those situations in which channel mapping is technically necessary to deal with signal interference and signal security.

**V. The Commission Should Prohibit Cable Operators From Introducing Set-Top Boxes That Utilize New Infrared Codes That Were Not Used for Existing Functions on the Date of the First Report and Order.**

- There are more than 224 million remote controls currently in use in 87 percent of U.S. households with televisions.
- Changing infrared codes affects not only remotes, but also VCRs and other consumer electronics equipment.

**VI. The Commission Should Promptly Initiate A Proceeding to Develop Digital Standards for Cable Service.**

- Standards will prevent future compatibility problems from arising in connection with the introduction of digital transmission methods by the cable industry.
- Standards are needed for digital transmission, digital compression and a security system interface.