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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

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

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

Dear Mr. Caton:

On Monday, October 2, 1995, representatives of the Consumer Electronics Group of the Electronic Industries Association ("EIA/CEG") made an ex parte presentation to David Furth and Robert Tanner of Commissioner Rachelle B. Chong 's office. Representing EIAKEG were Matthew J. McCoy of EIAKEG and the undersigned of this Firm. The views expressed on behalf of EIAKEG are reflected in the enclosed materials, as well as in EIA/CEG's prior filings in this proceeding.

Please let us know if you have any questions.

Sincerely,

Joseph P. Markoski

/jef
Enclosure

cc: David Furth
Robert Tanner

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Electronic Industries Association
Consumer Electronics Group

Ex Parte Presentation Regarding
Cable Compatibility

ET DOCKET NO. 93-7
OCTOBER 2, 1995

Three Sets of Issues

- Reconsideration
- Decoder Interface
- Digital Standards

Reconsideration

I. The Commission Should Not Require the Negative Labelling of Non- "Cable Ready " Television Receivers.

- Negative labelling is burdensome, misleading, and likely to perpetuate the use of set-top boxes.

- Affirmative labelling provides consumers with more useful information and is consistent with past FCC practice (e.g., Pt. 15, Pt. 68).

- The FCC's rules should accommodate Canadian "cable compatible television apparatus" labelling requirements.

Reconsideration

II. 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 defeat the purpose of "cable-ready" TVs and frustrate the growth of a competitive market for set-back equipment.

- Functions other than signal security should be provided by competitively supplied equipment.

Reconsideration

III. The Commission Should Prohibit Cable Operators From Introducing Set-Top Boxes That Do Not Respond to Infrared Codes That Were Used for Basic Functions on the Date of the First Report and Order.

- There are millions of remote controls in the marketplace (87% of U. S . households with televisions).
- There are also millions of very expensive TVs, VCRs and other consumer electronics equipment that use infrared to control set-top boxes.
- Providing cable operators with unlimited flexibility will strand consumer investment in consumer electronics equipment.

Reconsideration

IV. The Commission Should Prohibit "Channel Mapping" 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.
- At a minimum, the Commission should require cable operators to deliver their "channel maps" to television receivers in a standard format.

Reconsideration

V. The Commission Should Clarify or Alter Certain of the Technical Requirements for "Cable Ready" Television Receivers.

- The Commission should:
  - a Standardize the upper frequency limit for tuning and performance.
  - • Lower the 55 dB requirement for beat suppression to prevent tuner overload.
  - • Lower the image channel interference levels.
- The Commission's technical staff has worked with industry to resolve these purely technical issues.

Decoder Interface

The Commission Should Establish a Deadline for the Cable and Consumer Electronics Industries to Finalize the Specifications of the Decoder Interface.

- The two industries are still not very close to developing a compromise specification.
- The absence of an FCC-prescribed deadline has slowed the standards-setting process.
- If agreement cannot be reached, the Commission should consider abandoning the current Decoder Interface in favor of interdiction or similar techniques to promote cable compatibility.

Digital Standards

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.