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November 3, 1995

Mr. Alan Stillwell
Office of Engineering & Technology
Federal Communications Commission
Washington, DC 20554

Re: ET Docket No. 93-7

Dear Mr. Stillwell:

I have enclosed our filing from August 17, 1995 on Docket 93-7 to help answer your questions about EIA's position on certain issues. Item II on page 4 deals with the issue of bundling security and non-security functions. Our position remains unchanged. The only clarification to be added is that decoder equipment may be offered that bundles security and non-security functions, as long as our main point is also met -- that the subscriber be provided the option of obtaining a separate device that performs security-only functionality.

Our position on infrared codes, to be found in Item III on page 5, has not changed. I can define the "basic functions" that EIA believes must be supported to avoid stranding consumer electronics equipment. These basic functions are On/Off, digits 0-9, Enter, and Channel Up/Down, to be supported on a vendor-by-vendor basis.

I hope this information helps bring to closure last year's Report and Order. Please call me at 703-907-7645 if you have any questions.

Sincerely,

Brian Markwalter

Brian Markwalter
Staff Engineer

BEM/ms
Enclosure
cc (w/encl): Wendell Bailey, NCTA
William F. Caton, Acting Secretary, FCC

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Electronic Industries Association Consumer Electronics Group

Ex Parte Presentation Regarding Cable Compatibility

ET DOCKET NO. 93-7
AUGUST 17, 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:
 - 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.