

better signal quality.^{53/} As new entrants into a marketplace dominated by cable, wireless cable operators must aggressively compete with cable on the basis of service quality. Thus, regulation of wireless cable signal quality would represent an unnecessary intrusion into the marketplace.

G. It Is Not Necessary For The Commission To Adopt Technical Standards For Connections To Broadband Services.

The Commission has requested comment on whether it should adopt uniform technical standards for the connections necessary to attach wiring to customer premises equipment such as televisions, video cassette recorders and set-top boxes without causing signal leakage.^{54/} As noted by the Commission, even though the Commission does not specifically regulate this area, cable operators nonetheless almost exclusively employ “F-type” connectors for this purpose.^{55/} Wireless cable systems similarly have adopted the “F-type” connector for most purposes.

The fact that the “F-type” connector has evolved as the *de facto* industry standard for broadband connections suggests that it is unnecessary for the Commission to impose an additional overlay of regulation with respect to broadband connection equipment. Furthermore, the anticipated transformation of broadband service from analog to digital, combined with the potential convergence of video and telephony service into one wire, is likely to render any Commission regulation of this area premature at this time. Accordingly, WCA recommends that

^{53/}*See, e.g.,* Comments of the Wireless Cable Association International, Inc., CS Docket No. 95-61, at 11-16 (filed June 30, 1995).

^{54/}*NPRM* at ¶¶ 27-29.

^{55/}*Id.* at ¶ 27.

the Commission continue its current policy of allowing the marketplace to develop the appropriate standards for broadband connectors.

H. A Cable Operator That Fails To Remove Wiring Within Seven Days After Service Termination Should Be Barred From Exercising Future Control, Even If The Subscriber Has Vacated.

Finally, the Commission has requested comment on its tentative conclusion that cable operators should not be permitted to remove their wiring more than seven days after the subscriber has terminated service, even if the subscriber has vacated the premises before expiration of the seven-day period.^{56/} WCA agrees.

Cable operators should not be permitted to remove cable home wiring after the seven-day period, regardless of whether the subscriber has already vacated the premises. The Commission has already determined that the cable operator's failure to act within a reasonable time after service termination is what extinguishes the cable operator's right to claim ownership or control of the wiring.^{57/} Whether the subscriber remains on the premises is therefore irrelevant, since the subscriber's absence from the property cannot revive rights the cable operators has already lost.

^{56/} *FNRPM* at ¶ 42.

^{57/} *Id.* at ¶ 21.

III. CONCLUSION.

WHEREFORE, the Wireless Cable Association International, Inc. hereby supports the *NPRM and FNPRM*, subject to the comments set forth above.

Respectfully submitted,

WIRELESS CABLE ASSOCIATION
INTERNATIONAL, INC.

By: 
Paul J. Sinderbrand
Robert D. Primosch

Wilkinson, Barker, Knauer & Quinn
1735 New York Avenue, N.W.
Washington, D.C. 20006
(202) 783-4141

Its Attorneys

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