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National Cable Television Association

Neal M. Goldberg  
General Counsel

1724 Massachusetts Avenue, Northwest  
Washington, D.C. 20036-1969  
202 775-3664 Fax: 202 775-3603

June 3, 1998

**HAND DELIVERED**

Mr. William F. Johnson  
Deputy Chief, Cable Services Bureau  
Federal Communications Commission  
2033 M Street, N.W., Room 918  
Washington, D.C. 20554

**Re: Navigation Devices  
CS Docket No. 97-80**

Dear Bill:

I am enclosing a revised copy of the "OpenCable Timeline For Digital Separate Security Equipment" which we previously filed as an ex parte document in the above-referenced proceeding.

This document does not change the timetable previously submitted. Rather it clarifies that, by December, 1998, the OpenCable recommended specifications for the digital separate security module and its interface with the host box will both be completed, but, for obvious reasons, the specifications for the digital security module will not be made "publicly available" as will be the case with the specification for the host box interface. Changes in language from our previous filing are underlined.

In addition, I would like to clarify two points which have arisen in our meetings with Commission staff.

- **Timetable:** As you requested, we are enclosing a document reflecting interim milestones we believe the OpenCable process will meet between now and December, 1998 when the recommended module and interface specifications are complete. While we do not believe these milestones -- as opposed to the December, 1998 and September, 2000 dates -- should be codified in an FCC performance standard rule, OpenCable is committed to meeting or beating these milestones.

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William Johnson

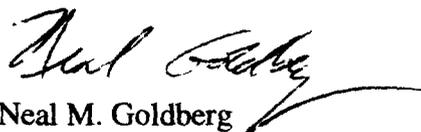
June 3, 1998

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- **Digital Only:** The attached timetable applies only to the digital security module and digital host box interface -- it does not apply to analog security modules or interfaces for an analog or hybrid box. The applicability of a commercial availability rule to an analog or hybrid box may well, at a minimum, result in further delays in the attached timetable and, in any event, creates a myriad of practical implementation problems. But it is important to note that so-called digital boxes will be capable of accepting unscrambled analog as well as digital transmissions. Therefore, if the FCC excludes analog and hybrid boxes from the ambit of its rules, consumers who buy "digital" boxes at retail will also be able to receive unscrambled analog transmissions with those boxes. The only current services they will not be able to receive with the commercially available digital box will be scrambled analog.

If you have any questions, please contact me.

Sincerely



Neal M. Goldberg

Attachment

NMG:tkb

cc: Magalie Roman Salas, Secretary, for inclusion in Docket No. 97-80  
Chairman William Kennard  
Commissioner Susan Ness  
Commissioner Michael Powell  
Commissioner Harold Furchtgott-Roth  
Commissioner Gloria Tristani  
Susan Fox, Office of Chairman Kennard  
Anita Wallgren, Office of Commissioner Ness  
Jane Mago, Office of Commissioner Powell  
Rick Chessen, Office of Commissioner Tristani  
Paul Misener, Office of Commissioner Furchtgott-Roth  
Helgi Walker, Office of Commissioner Furchtgott-Roth  
Karen Kornbluh, Deputy Chief, Mass Media Bureau  
Dale Hatfield, Chief, Office of Engineering and Technology  
Robert S. Schwartz, Esquire, Counsel to Circuit City Stores, Inc.

**OPENCABLE TIMELINE FOR  
DIGITAL SEPARATE SECURITY EQUIPMENT**

**FCC Navigation Device Order**

**June 1998**

**OpenCable recommended specifications  
for (1) digital separate security module completed  
and (2) its interface with host box completed and  
made publicly available**

**December 1998**

**Separate digital security modules available  
from cable operators**

**September 2000\***

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\* While not within control of cable operator, under this schedule, digital host devices for digital security modules should be able to be manufactured for retail availability by September 2000.

## Navigation Device Proceeding

### Interim Milestones for OpenCable Digital Security Equipment

#### Digital Security Module Interface (OCI-C2) – Currently in Draft Status

Draft specification document for member review and discussion	7/1/98
Draft specification document for vendor review and discussion	7/15/98
Interim specification document for final review and approval by members and vendors	10/1/98
OpenCable recommended specification made publicly available and released to SCTE for adoption as a US standard	12/98

#### Digital Security Module Specification

Draft Digital Security Module specification document completed	7/30/98
Draft Digital Security Module specification document for independent review by Scientific Atlanta and General Instrument	8/15/98
Interim Digital Security Module specification document for final review	10/15/98
OpenCable Digital Security Module specification completed	12/98

#### Key to Document Status Codes:

<b>Work in Process</b>	An incomplete document, designed to guide discussion and generate feedback, that may include several alternative requirements for consideration.
<b>Draft</b>	A document in specification format considered largely complete, but lacking review by Members and vendors. Drafts are susceptible to substantial change during the review process.
<b>Interim</b>	A document which has undergone rigorous Member and vendor review, suitable for use by vendors to design in conformance to and for field testing.
<b>Released</b>	A stable document, reviewed, tested and validated, suitable to enable cross-vendor interoperability.