



James K. Smith  
Director  
Federal Relations

EX PARTE OR LATE FILED

June 4, 1998

Ms. Magalie Roman Salas  
Secretary  
Federal Communications Commission  
1919 M Street, NW  
Room 222  
Washington, DC 20554

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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

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Re: **Ex Parte Statement**  
CS Docket 97-80

Dear Ms. Salas:

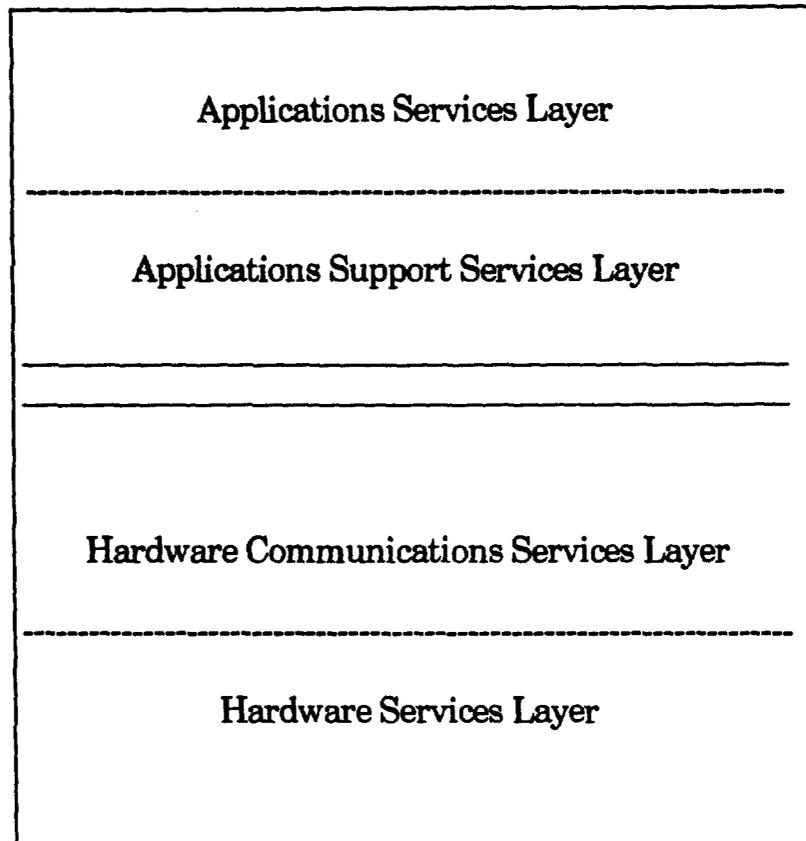
On Wednesday, June 3, 1998, Deborah Morris, Vice President and General Counsel, Dave Mahachek, Vice President, Operations, and I met with the following individuals: Commissioner Susan Ness and Anita Wallgren; Paul Misener and Helgi Walker, Office of Commissioner Furchtgott-Roth; Jane Mago Office of Commissioner Powell; Rick Chessen, Office of Commissioner Tristani; Bill Johnson and Deborah Klein, Cable Services Bureau; Dale Hatfield, Office of Engineering and Technology; and Karen Kornbluh, Mass Media Bureau.

The purpose of the meetings was to discuss Ameritech New Media's (ANM) position on issues raised in this proceeding. ANM discussed the four layer architecture as set forth on pages 14 and 15 of its Comments filed in this proceeding and attached hereto. ANM took the position that customers should have the option of obtaining from ANM integrated devices which enhance ANM's ability to compete in the marketplace through product differentiation.

Sincerely,

Attachment

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List A B C D E



Starting from the bottom of the depiction, the layers are described as follows. The Hardware Services Layer governs the physical aspects of connection, *e.g.* number of pins in a connector, pin configuration, minimum amount of memory in a smartcard. The Hardware Communications Services Layer, which interrelates with the Hardware Services Layer, governs the electrical aspects of connection, *e.g.* standardized data formats, signals to each pin of the connector, protocols between electronic devices. These two layers form the platform on which the generic interface rests.

Turning to the top two layers of the diagram, the Applications Support Services Layer contains the operating system, encryption services, application communication services, *e.g.* TCP/IP protocol stacks, and “miniware” software shells on which customized applications can be built. The Applications Services Layer is where the service applications themselves reside, *e.g.* navigators, electronic program guides, transactional services. Even though the top two layers are resident within the equipment, it is in these layers that MVPDs and manufacturers will develop innovative and differentiating features and functions. Consequently, these two top layers should not be subject to standardization, as they work together to define the specific services provided.

This four-part hierarchy is based on standards work in the computer industry that has worked well to promote both standardization for purposes of basic access and the functional differentiation requirements of the marketplace. Standards should not result in total uniformity such that product differentiation among competing service providers is rendered a virtual impossibility. The optimum standards framework should require open interfaces, but allow for proprietary algorithms for security and other differentiating functionalities.