



January 20, 2015

The Honorable Thomas Wheeler, Chairman
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: DA 14-1762

Dear Chairman Wheeler:

Based on information from the Commission's staff, the FCC's Downloadable Security Technical Advisory Committee (DSTAC) has at least two glaring omissions that can be remedied by the inclusion of one nominee.

Federal Technical Advisory Committees, particularly those mandated to suggest industry-wide technical standards, are expected to at least have representative technical expertise of all directly competing technologies. The DSTAC working group is missing that balance. It has been charged with seeking 'not unduly burdensome' downloadable set-top box security technology for cable television systems, yet there is no one on the working group who operates or is intimately familiar with the unique technological needs and burdens of small cable television systems.

The working group, while apparently having multiple representatives expert and advocating or knowledgeable regarding "public/private key" downloadable set-top boxes, includes no one with expertise in the competing, existing set-top box design using a "symmetrical key" approach, which does not require a "trusted authority." It is that "trusted authority" which creates one of the most significant hurdles to industry and platform agnostic acceptance. No one wants to "trust" a repository of vulnerable "secret key" control to anyone else. The newly developed symmetrical key technology for cable television set-top boxes, already recognized by the Commission, eliminates that problem and might constitute a way to reach industry consensus. But that will not happen if the

working group remains completely devoid of any technical expert intimately familiar with it.

We ask that you reconsider including Beyond Broadband Technology's (BBT) Chief Technical Officer and CEO, William (Bill) Bauer on the DSTAC. Mr. Bauer is not only the single technical expert most familiar with the new symmetrical/no "trusted authority" approach (he is one of the named inventors and patent holders), but also he is well known as a small cable system operator and advocate on the issues facing those operators.

The DSTAC working group should not start out with clearly one-sided competitive representation. Its technical conclusions can only be diminished by the obvious exclusion of expertise regarding a competitive technology the Commission has already recognized. It would also significantly benefit from the practical understanding of how downloadable security can be reasonably implemented in the unique cohort of smaller and more rural cable environments. The inclusion of Mr. Bauer will resolve both of those omissions in the current make-up of the working group.

Sincerely,



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Please address all technical inquiries directly to Mr. Bauer at 308-436-4650 (bill@intertech.net). A more detailed statement from Beyond Broadband Technology on the issues involved in this request is also attached.

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