

LAW OFFICES  
**GOLDBERG, GODLES, WIENER & WRIGHT LLP**  
1229 NINETEENTH STREET, N.W.  
WASHINGTON, D.C. 20036-2413

HENRY GOLDBERG  
JOSEPH A. GODLES  
JONATHAN L. WIENER  
DEVENDRA ("DAVE") KUMAR

HENRIETTA WRIGHT  
THOMAS G. GHERARDI, P.C.  
COUNSEL

THOMAS S. TYCZ\*  
SENIOR POLICY ADVISOR  
\*NOT AN ATTORNEY

(202) 429-4900  
TELECOPIER:  
(202) 429-4912

e-mail: general@g2w2.com  
website: www.g2w2.com

August 6, 2015

**ELECTRONIC FILING**

Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12th Street, SW  
Washington, DC 20554

**Re: *Ex Parte*, CS Docket No. 97-80, PP Docket No. 00-67, MB Docket No. 12-328**

Dear Ms. Dortch:

This is to inform you that on August 5, 2015, Matthew Zinn, Senior Vice President, General Counsel, Secretary & Chief Privacy Officer, and Dr. Joseph Weber, Chief Technical Officer for the Service Provider Business Unit of TiVo Inc. ("TiVo") and the undersigned (collectively, the "TiVo representatives") met with: (1) Scott Jordan, Chief Technology Officer, and (2) Michelle Carey, Nancy Murphy, Steve Broeckaert, Jeff Neumann, and Mary Beth Murphy of the Media Bureau.

The TiVo representatives urged the Commission to clarify the continuing obligation of operators to provide CableCARDS to users of retail navigation devices.<sup>1</sup> The TiVo representatives stressed the importance of removing uncertainty regarding the Commission's CableCARD rules and providing consumers and retail manufacturers with certainty that navigation devices purchased at retail will continue to receive cable signals that consumers have subscribed to after the integration ban sunsets.

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<sup>1</sup> TiVo has previously explained why operators' obligation to provide CableCARDS remains in place following the D.C. Circuit's 2013 decision in *EchoStar Satellite L.L.C. v. FCC*, 704 F.3d 992 (D.C. Cir. 2013), but has also urged the Commission to provide clarity given contrary press reports and statements by some operators. See TiVo Inc. Reply to Opposition, MB Docket No. 12-328, CS Docket No. 97-80, at 2-7 (filed June 10, 2013).

In response to questions by Commission staff, the TiVo representatives provided an update on TiVo's 2014 agreement with Comcast Corporation intended to promote consumer choice and innovation in the video device marketplace.<sup>2</sup> The TiVo representatives spoke favorably about progress made by Comcast to improve its provision and support of CableCARDS used by subscribers who choose to use TiVo set-top boxes or other retail navigation devices, including the establishment of a dedicated CableCARD support help-line, and an easy-to-access website with information on CableCARDS.<sup>3</sup> The TiVo representatives also responded to questions about discussions with Charter Communications concerning the use of Charter's downloadable security solution in TiVo's retail products as envisioned in the 2013 Order granting Charter a waiver of Section 76.1204(a)(1) of the Commission's rules.<sup>4</sup>

Please direct any questions regarding this matter to the undersigned.

Respectfully submitted,

A handwritten signature in black ink that reads "T. Devendra Kumar". The signature is written in a cursive style with a horizontal line underlining the name.

Devendra T. Kumar  
*Attorney for TiVo Inc.*

cc: Scott Jordan  
Michelle Carey  
Nancy Murphy  
Mary Beth Murphy  
Steve Broeckert  
Jeff Neumann

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<sup>2</sup> Letter from Jordan Goldstein, Vice President, Regulatory Affairs, Comcast Corp., and Matthew Zinn, Senior Vice President, General Counsel, Secretary & Chief Privacy Officer, TiVo Inc., to Marlene H. Dortch, Secretary, FCC, CS Docket No. 97-80, MB Docket No. 10-91 (July 14, 2014).

<sup>3</sup> See [www.comcast.com/cablecard](http://www.comcast.com/cablecard).

<sup>4</sup> *Charter Communications, Inc. Request for Waiver of Section 76.1204(a)(1) of the Commission's Rules*, MB Docket No. 12-328, Memorandum Opinion and Order, DA 13-788, at 9 ¶10 (rel. Apr. 18, 2013).