



# Public Knowledge

October 6, 2015

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

Re: *Downloadable Security Technical Advisory Committee Reports*, MB Docket No. 15-64

Dear Ms. Dortch:

On October 5th, I spoke briefly with Alison Neplokh, FCC Deputy Chief Technologist, to discuss the advantages of the “video head-end” DSTAC proposal over the “app” proposal. In particular, I discussed how the video head-end proposal would allow for third-party navigation devices to meaningfully differentiate themselves from and compete with each other. I stated Public Knowledge’s view that the FCC should proceed to a rulemaking proceeding implementing the video head-end approach, resulting in rules that create a clear, nationwide standard for video device compatibility with MVPD systems.

Respectfully submitted,

/s/ John Bergmayer  
*Senior Staff Attorney*  
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