



March 24, 2016

**Via Electronic Filing**

Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 Twelfth St., S.W.  
Washington, DC 20554

**Re: In the Matter of Expanding Consumers' Video Navigation Choices, Commercial Availability of Navigation Devices, MB Docket No. 16-42, CS Docket No. 97-80, PP Docket No. 00-67.**

Dear Ms. Dortch:

On March 22, 2016, the Consumer Video Choice Coalition, as represented by the undersigned of the Computer & Communications Industry Association; Jeff Kardatzke and Megan Anne Stull of Google Inc.; Brad Love of Hauppauge Computer Works, Inc. with counsel Robert Schwartz; Angie Kronenberg and Christopher Shipley of INCOMPAS; John Bergmayer of Public Knowledge with consultant Adam Goldberg; and Joseph Weber and Matthew Zinn of TiVo Inc. with counsel Dave Kumar (collectively, the "Coalition representatives"), met with Media Bureau personnel and the Chief and the Deputy Chief Technologist, as listed and copied below. The subject of the meeting was the Commission's pending Notice of Proposed Rulemaking<sup>1</sup> in the dockets referenced above.

The Coalition representatives expressed support for the Commission's proposals to provide greater consumer choice and competition in navigation devices. They stressed that any technological standards referenced as compliant in final Commission rules should provide for competitive interoperability across all MVPD systems, consistent with Congress's reference to a "uniform, and technology- and platform-neutral software-based downloadable security system"<sup>2</sup> in furtherance of Section 629 of the Communications Act.<sup>3</sup>

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<sup>1</sup> *In the Matter of Expanding Consumers' Video Navigation Choices, Commercial Availability of Navigation Devices*, Notice of Proposed Rulemaking and Memorandum Opinion and Order, MB Docket No. 16-42, CS Docket No. 97-80 (rel. Feb. 18, 2016) ("NPRM").

<sup>2</sup> STELA Reauthorization Act of 2014, Pub. L. No. 113-200, § 106, 128 Stat. 2059, 2063-4 (2014).

<sup>3</sup> 47 U.S.C. § 549.

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The Coalition representatives also acknowledged the feasibility of device provider certifications to affirm adherence to industry best practices and/or Commission rules respecting privacy, emergency alerting, accessibility rules, parental controls, and children's programming advertising limits. The Coalition representatives pledged to continue identifying solutions and technological standards in the "device" (including software), "cloud," and "app" areas that are pro-competitive, interoperable, and otherwise compliant with the Commission's expectations and rules. Additionally, the Coalition representatives urged the Commission to act on the pending petition<sup>4</sup> to reinstate its Encoding Rules to restore the balance between content protection and user expectations, as represented by the DFAST License Compliance and Robustness Rules and the Encoding Rules.

This letter is being provided to your office in accordance with Section 1.1206 of the Commission's rules.

Respectfully submitted,

*Consumer Video Choice Coalition*

/s/ John Howes  
CCIA

cc:  
Bill Lake  
Kathy Berthot  
Michelle Carey  
Lyle Elder  
Martha Heller  
Mary Beth Murphy  
Nancy Murphy  
Brendan Murray  
Scott Jordan  
Antonio Sweet

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<sup>4</sup> Public Notice, Media Bureau Seeks Comment on TiVo Petition for Rulemaking to Reinstate the Commission's Second Report and Order Implementing Section 629 of the Act and Associated Rules, CS Docket No. 97-80; PP Docket No. 00-67 (rel. July 24, 2013).