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June 23, 1999

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

BY HAND DELIVERY

Magalie Roman Salas
Secretary
Federal Communications Commission
The Portals -- Room TW-A325
445 Twelfth Street, S.W.
Washington, D.C. 20554

Re: Ex Parte Communication: CS Docket No. 97-80, CS Docket No. 98-120,
MM Docket No. 99-25

Dear Ms. Salas:

On Tuesday, June 22, 1999, Michael Petricone of the Consumer Electronics Manufacturers Association ("CEMA") and David Alan Nall of Squire, Sanders & Dempsey LLP, met in separate meetings with Tom Power, Senior Legal Advisor to Chairman William E. Kennard and Kim Matthews, Legal Advisor to Commissioner Susan Ness.

CEMA briefly discussed the Commission's recent Order on Reconsideration, released on May 14, 1999, in CS Docket No. 97-80, and emphasized concerns previously raised about the stockpiling of integrated navigation devices and the timeliness of the OpenCable standardization process as it relates to the deadline of July 1, 2000 for the deployment of unbundled navigation device security modules ("PODS").

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CEMA also discussed the issue of copy protection, relevant to CS Docket No. 98-120, as raised in MPAA's *ex parte* letter of June 29. CEMA noted that the "proposed conditions on the use of 5C technology" to which MPAA objects in that letter are legitimate terms for the licensing of 5C that are consistent with the regular and customary home recording rights currently enjoyed by American consumers embodied in the Digital Millennium Copyright Act and the Supreme Court's historic *Betamax* decision.

Finally, CEMA briefly discussed CEMA's concern over interference issues in connection with MM Docket No. 99-25. CEMA informed Mr. Power and Ms. Matthews that CEMA would be submitting a copy of a study on digital audio radio systems as an *ex parte* document in advance of the initial comment deadline of August 2, 1999, in Docket No. 99-25, in order to give interested parties an opportunity to comment on the study in their initial comments.

Pursuant to Section 1.1206 of the Commission's Rules, an original and five copies of this letter are being filed with your office for inclusion in the public record. If you have any questions concerning this submission, please contact the undersigned.

Sincerely,



David Alan Nall

*Counsel for the Consumer Electronics
Manufacturers Association*

Enclosure

Copy: Thomas Power, Office of Chairman Kennard
Kim Matthews, Office of Commissioner Ness
Michael Petricone, Director of Technology Policy, CEMA