

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554**

In the Matter of)	
)	
Compatibility Between Cable)	PP Docket No. 00-67
Systems and Consumer)	
Electronics Equipment)	
)	

**REPLY COMMENTS OF
ZENITH ELECTRONICS CORPORATION**

Zenith Electronics Corporation (“Zenith”) hereby respectfully submits these reply comments in the above-captioned proceeding.¹

The Consumer Electronics Association (“CEA”) and National Cable Television Association (“NCTA”) recently reached an agreement establishing the labeling to be used to inform consumers about the capabilities of various digital television sets to receive digital and interactive digital television services when connected to a cable system. In its negotiations with CEA, NCTA initially took the position that all DTV sets should include a 1394/5C connector. As a compromise, CEA and NCTA agreed that all DTV sets need not have a 1394/5C connector, but that special labeling be required for sets without the connector. Specifically, under their agreement, CEA and NCTA are recognizing two categories of cable-compatible DTV sets. Digital TV sets

¹ See In the Matter of Compatibility Between Cable Systems and Consumer Electronics Equipment, Notice of Proposed Rule Making, PP Docket No. 00-67, FCC 00-137 (rel. April 14, 2000).

possessing a 1394/5C connector will be labeled “Digital TV-Cable Interactive.” Digital sets that lack this connector, but are equipped with a POD interface and otherwise conform to OpenCable technical specifications, will be labeled “Digital TV-Cable Connect.” The agreed upon labels for these sets will advise consumers that without the 1394/5C interface, they may not receive interactive services or high definition (HDTV) programming.

Although Zenith is encouraged by the significant progress made thus far to resolve cable interoperability issues and is hopeful that inter-industry discussions will continue to be constructive, Zenith is deeply concerned that this set labeling proposal, coupled with NCTA’s insistence in its comments that all digital television sets should have a 1394/5C connector, presages the cable industry’s intent to not follow through on the OpenCable initiative.²

As CEA and other commenters have noted, a 1394 interface on a receiver is not the exclusive means for receiving either interactive services or HDTV programming. The interface merely provides a means, one of many possible, to connect a set-top box to the receiver and to use the receiver essentially as a monitor. A DTV receiver without the 1394 interface, but built to OpenCable specifications, would also be able to receive interactive services and HDTV programming via cable. In view of this fact, Zenith fears that NCTA’s continued insistence that all DTV sets include the 1394 interface is a clear and ominous warning sign that the cable industry does not intend to honor its agreement to provide OpenCable specifications within a reasonable time frame. If

² See NCTA Comments at 7-11. See also Time Warner Comments at 15-17.

indeed the cable industry is not committed to the deployment of OpenCable devices,
Zenith respectfully submits that it cannot support the CEA/NCTA agreement.

Accordingly, Zenith urges the Commission to maintain vigilant oversight of the
cable industry's compliance with its OpenCable obligations to ensure the development of
a fully competitive market for all forms of equipment that connect to cable systems.

Respectfully submitted,

**ZENITH ELECTRONICS
CORPORATION**

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