



NCTA

NATIONAL CABLE & TELECOMMUNICATIONS ASSOCIATION

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January 3, 2002

BY FACSIMILIE

The Honorable Michael K. Powell
Chairman
Federal Communications Commission
445 12th Street S.W., Room 8-B201
Washington, D.C. 20554

**Re: Compatibility Between Cable Systems And Consumer Electronics
Equipment PP Docket No. 00-67**

Dear Mr. Chairman:

I am pleased to advise you that, on December 26, 2001, the National Cable & Telecommunications Association (“NCTA”) submitted an update to the third progress report called for in the above-referenced proceeding. In that update (a copy of which is attached), we reported that Cable Television Laboratories Inc. (“CableLabs”) had completed the OpenCable Application Platform (“OCAP”) specification. That “middleware” specification – OCAP 1.0 – was published on the OpenCable website (www.opencable.com) on December 21, 2001.

Today CableLabs issued a press release describing in further detail OCAP 1.0 and I am attaching that release to this letter for your information. The press release makes reference to a letter sent to Dr. Richard Green, President and CEO of CableLabs, by leading MSOs who are members of CableLabs Executive Committee indicating that their systems will support CableLabs-certified, OCAP-enabled devices (e.g. digital television sets, set-top boxes) once such devices become commercially available. A copy of that letter is included in the attached update we submitted on December 26, 2001.

Finally, as we also reported on December 26, 2001, the Engineering Committee of the Society of Cable Telecommunications Engineers (“SCTE”) has unanimously approved the Digital Cable Network Interface Standard (and two other related standards) which implements the technical agreement reached by NCTA and the Consumer Electronics Association on February 22, 2000. The agreement – and now the SCTE US standard – defines the characteristics and normative specifications for the network interface between a cable television system and commercially-available consumer equipment that is used to access multichannel video programming so that digital television sets can be connected directly to cable systems.

Chairman Powell
January 3, 2002
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If you have any questions about these matters, please do not hesitate to contact me.

Best regards,

Neal M. Goldberg

cc: Commissioner Kathleen Q. Abernathy
Commissioner Michael J. Copps
Commissioner Kevin J. Martin
Susan M. Eid, Legal Advisor to Chairman Powell
Stacy Robinson, Legal Advisor to Commissioner Abernathy
Susanna Zwerling, Legal Advisor to Commissioner Copps
Catherine Bohigian, Legal Advisor to Commissioner Martin
W. Kenneth Ferree, Chief, Cable Services Bureau
Tom Horan, Legal Advisor to Chief, Cable Services Bureau
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John Wong, Division Chief, Engineering and Technical Services Division, CSB
Michael Lance, Deputy Chief, Engineering and Technical Services Division, CSB
Robert Pepper, Chief, Office of Plans and Policy
Amy Nathan, Senior Legal Counsel, Office of Plans and Policy
Jonathan Levy, Deputy Chief Economist, Office of Plans and Policy
Bruce Franca, Acting Chief, Office of Engineering and Technology
Rick Chessen, Associate Bureau Chief (Law), Mass Media Bureau
Magalie R. Salas, Secretary (for inclusion in PP Docket 00-67)

Contact:

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Cable Industry Milestone

CableLabs® Publishes OCAP™
Middleware Specifications

Louisville, January 3, 2002 – Cable Television Laboratories, Inc. (CableLabs®) has finalized the OpenCable™ Application Platform (OCAP™) software specification. Called OCAP 1.0, the specification is available to manufacturers, content developers, and the public through the OpenCable Web site (www.opencable.com).

OCAP enhances the ability for consumer electronics manufacturers to build and market set-top boxes or integrated television receivers directly to consumers. These devices would be able to receive the services available on set tops provided by the cable operator. The specification enables cable to create an interactive television delivery mechanism to provide enhanced services to cable customers.

“CableLabs has accomplished an unprecedented milestone that places the cable industry out front when it comes to openly available, publicly accessible guidelines for creating new and exciting interactive entertainment applications for cable consumers,” said Time Warner’s Joseph Collins, Chairman and CEO of AOL Time Warner Interactive Video who also is Chairman of the CableLabs Board of Directors. “We intend to fully support OCAP-enabled, OpenCable set-tops and other devices when they appear on our networks,” Collins added.

Leading cable companies represented on the CableLabs Executive Committee, including the nation’s top six multiple system operators (MSOs), committed to support OCAP in a letter to CableLabs CEO & President Dr. Richard Green. The MSOs wrote that their systems would support CableLabs-certified, OCAP-enabled devices once such equipment becomes commercially available, and concluded that “[t]he commitment embodied in this letter takes the process of retail availability of navigation devices to the next level, to include CableLabs-certified, OCAP-enabled devices.”

The OCAP specification is largely based on the European Multimedia Home Platform (MHP) middleware specification created by the Digital Video Broadcasting (DVB) organization. Thus, there is an opportunity for worldwide interoperability of interactive applications and

content. The MHP and OCAP specifications also have been submitted to the International Telecommunications Union (ITU) as a contribution to an international standard.

“This process gives the consumer electronics community even more incentive to go full steam ahead into competitive manufacturing of set-top boxes and cable-friendly digital television receivers,” said Dr. Richard R. Green, CableLabs President and CEO.

“Panasonic congratulates CableLabs on their release of the OCAP 1.0 specification,” said Paul Liao, CTO of Matsushita Electronic Corp. of America. “As the specification develops, we look forward to the widespread and early adoption of OCAP by U.S. cable operators. By building on MHP, the OCAP specification is a good step toward a consistent, open, and more global, platform, which should permit the development of an expanding world of advanced interactive cable services.”

“As a long-time proponent of open standards, a contributing member of DVB-MHP, and as a strong supporter of the OpenCable software specification initiative, Canal+ Technologies applauds CableLabs for the finalization of the OCAP specifications,” said David Moss, CEO of Canal+ Technologies, Inc. “Leveraging MHP as the foundation for OCAP sends a strong message that the US cable market is definitively a member of the global digital television community, ultimately leading to greater value and benefits for US cable operators and their subscribers not just in consumer electronics products but in compelling new interactive content and services.”

“Liberate Technologies is an author of the OCAP specification, member of the DVB-MHP consortium and the only middleware platform certified for Java, the foundation for MHP,” said Dave Limp, Chief Strategy officer of Liberate Technologies. “As the industry leader in developing open standards-based software platforms, we remain committed to helping CableLabs accelerate delivery of interactive services to customers everywhere.”

“As one of the participating companies in the OCAP process, Microsoft supports fair and open industry specifications. Consumers will benefit through greater choice and innovation as the standards evolve to enable more product options, innovative programming and a variety of price points,” said Alan Yates, Vice President of sales and marketing for Microsoft TV. “We are pleased to work with CableLabs toward this goal and look forward to working with the cable industry to advance new cable products toward commercial success.”

“This is a positive step forward for the industry. We believe the development of standards and standards-based products are critical for the long-term growth of the interactive television industry,” said Vincent Dureau, OpenTV chief technology officer. “OpenTV has actively engaged in the implementation of MHP software and applications in Europe and is a member of the DVB steering committee. We are proud to be the first to release product ready for certification by the MHP standard. We look forward to working with CableLabs and other leading industry players in the U.S. to provide compelling middleware and content, as we have done around the world.”

The release of the OCAP 1.0 specification supports an EE environment (based on Java technology), and will serve as the core for a family of future OCAP products. For example, OCAP 2.0, which will be finalized shortly, provides the addition of the Presentation Engine (PE) and a “bridge” that allows both to work together. The PE, similar to a Web browser, will provide support for creating and using the Web’s standardized markup and scripting languages, Hypertext Markup Language (HTML) and ECMAScript. Manufacturers may choose to develop immediately to OCAP 1.0, or move directly to an OCAP 2.0 development, giving them flexibility to target different customer needs.

OCAP 2.0 will be fully backward compatible with OCAP 1.0. Further, OCAP 1.0 and 2.0 have been designed such that interactive television applications that have already been deployed by cable companies will continue to work when customers upgrade to an OCAP-compliant device.

CableLabs has already begun defining an OCAP test plan, as well as coordinating an extensive developer support program. CableLabs will conduct a full-day Developer Conference in February to connect manufacturers and developers with the many providers of technology, tools, and services that will support OCAP. CableLabs also is planning an informal OCAP interoperability test wave at its laboratories in March.

CableLabs is a research and development consortium of cable television system operators representing the continents of North America and South America. CableLabs plans and funds research and development projects that will help cable companies take advantage of future opportunities and meet future challenges in the cable television industry. It also transfers relevant technologies to member companies and to the industry.

In addition, CableLabs acts as a clearinghouse to provide information on current and prospective technological developments that are of interest to the cable industry. CableLabs maintains web sites at www.cablelabs.com; www.cablemodem.com; www.cablenet.org; www.opencable.com; and www.packetcable.com.

December 26, 2001

Ms. Magalie R. Salas
Secretary
Federal Communications Commission
445 12th Street S.W.
Washington, D.C. 20554

**Re: Compatibility Between Cable Systems And Consumer Electronics
Equipment PP Docket No. 00-67**

Pursuant to the Commission's Report and Order ("R&O") in the above captioned proceeding, and on behalf of the National Cable & Telecommunications Association ("NCTA"), I am submitting an update to the third progress report called for in the R&O which we submitted on October 31, 2001. Among other things, in our October 31, 2001 submission we reported on the status of the technical specifications which would allow Digital Television ("DTV") sets to be connected directly to digital cable systems and the status of the CableLabs OpenCable Application Platform ("OCAP") specification. This letter reports on developments in those two efforts since the filing of our previous report.

On November 27, 2001, the Engineering Committee of the Society of Cable Telecommunications Engineers ("SCTE") unanimously approved the Digital Cable Network Interface Standard which implements the technical agreement reached by NCTA and the Consumer Electronics Association on February 22, 2000. That standard defines the characteristics and normative specifications for the network interface between a cable television system and commercially-available consumer equipment that is used to access multichannel video programming. The interface is also compatible with existing set-top terminal equipment deployed by cable operators and with terminal equipment developed using the OpenCable specifications. This standard, formerly DVS/313, is now denominated SCTE 40 2001 and is available on the SCTE website (www.scte.org).

At the same time, SCTE's Engineering Committee also unanimously approved two related standards: (1) SCTE 28 2001 (formerly DVS/295), the Host-POD Interface Standard, which defines the characteristics and normative specifications for the interface between the Point-of-Deployment ("POD") separate security modules owned and distributed by cable operators and OpenCable-compliant subscriber equipment, including set-top boxes and other customer electronic devices ("host devices"), that are used to access multichannel video programming carried on cable systems; and (2) SCTE 41 2001 (formerly DVS/301), the POD Copy Protection Standard, which defines the characteristics and normative specifications for the system that prevents the unrestricted copying of high value content as it crosses the POD-Host interface.

As we stated in our October 31, 2001 report, the cable industry was working with dispatch to finish the OpenCable Application Platform (“OCAP”) specification which includes a set of Application Programming Interfaces (“APIs”). We are pleased to report that the CableLabs OCAP specification – OCAP 1.0 – has been completed and was published on the OpenCable website (www.opencable.com) on December 21, 2001.

As evidence of the industry’s commitment to OCAP, I am attaching to this submission a letter from leading multiple system operators to Dr. Richard Green, Chief Executive Officer of CableLabs, describing their intentions to implement the OCAP specification in their systems so that those systems will support CableLabs-certified, OCAP-enabled devices once such equipment becomes commercially available.

We believe these recent developments further demonstrate the leading role the cable industry is taking to facilitate both the digital transition and the retail availability of navigation devices. If you have any questions about these matters, please do not hesitate to contact me.

Respectfully submitted,

William A. Check, Ph.D.
Vice President, Science and Technology

cc: Chairman Michael K. Powell
Commissioner Kathleen Q. Abernathy
Commissioner Michael J. Copps
Commissioner Kevin J. Martin
W. Kenneth Ferree, Chief, Cable Services Bureau
Tom Horan, Legal Advisor to Chief, Cable Services Bureau
Paul Gallant, Special Advisor, Cable Services Bureau
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Robert Pepper, Chief, Office of Plans and Policy
Amy Nathan, Senior Legal Counsel, Office of Plans and Policy
Jonathan Levy, Deputy Chief Economist, Office of Plans and Policy
Bruce Franca, Acting Chief, Office of Engineering and Technology
Rick Chessen, Associate Bureau Chief (Law), Mass Media Bureau

December 21, 2001

Richard R. Green
President and Chief Executive Officer
Cable Television Laboratories, Inc.
400 Centennial Parkway
Louisville, Colorado 80027-1266

Dear Dick:

In meetings at the FCC, you have been asked how the cable industry intends to carry out its commitment to implement CableLabs Open Cable Applications Platform (OCAP) middleware. With our support, CableLabs has developed specifications for OCAP middleware, which will operate in home devices to permit downloading and execution of applications, such as program guides, that we will provide to our subscribers.

By this letter, we express our intention to take all reasonable steps so that our systems will support CableLabs-certified, OCAP-enabled devices once such equipment becomes commercially available. This commitment includes CableLabs-certified set-top boxes, integrated digital TV (DTV) receivers and other OCAP-enabled devices.

These devices, with appropriate capability, can provide the services we make available to our customers using the set-tops we lease. By being commercially available, these devices will advance Congress's goal to permit a cable customer to purchase equipment, including integrated DTV receivers, instead of leasing a set-top box from the operator in order to receive the services the operator provides.

This commitment is a follow-on from industry-wide commitments to support the interoperability of our systems with devices compliant with the OpenCable specifications adopted prior to adoption of the OCAP specifications. Those devices, which include an OpenCable compliant point-of-deployment (POD)-Host interface, may be made available at retail, are portable, and function on our upgraded digital systems.

The commitment embodied in this letter takes the process of retail availability of navigation devices to the next level, to include CableLabs-certified, OCAP-enabled devices. We trust it will provide you with a more specific commitment from the undersigned companies in communicating the cable industry's position at the FCC regarding these OCAP-enabled devices.

Richard R. Green
December 21, 2001

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Sincerely,

/s/ James Rigas
James Rigas, Exec. Vice President
Adelphia Cable Communications Corp.

/s/ William Schleyer
William Schleyer, President and CEO
AT&T Broadband

/s/ Carl Vogel
Carl Vogel, President and CEO
Charter Communications, Inc.

/s/ Brian Roberts
Brian Roberts, President
Comcast Corporation

/s/ James Robbins
James Robbins, President and CEO
Cox Communications, Inc.

/s/ Robert Miron
Robert Miron, President
Advance/Newhouse Communications

/s/ Joseph Collins
Joseph Collins, Chairman and CEO
AOL Time Warner Interactive Video

/s/ Scott Chambers
Scott Chambers, President
Chambers Communications Corp.

/s/ Glenn Britt
Glenn Britt, Chairman and CEO
Time Warner Cable