

**EX PARTE**

July 24, 2003

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

Re: CS Docket No. 97-80; PP Docket No. 00-67

Dear Ms. Dortch:

On July 22, 2003, Art Allison, Director of Advanced Engineering, National Association of Broadcasters Science & Technology and Karen Kirsch and Valerie Schulte, NAB Legal Department met with Rick Chessen, Eloise Gore, Alison Greenwald, William Johnson, Walid Kassem, Mike Lance, Susan Mort, Mary Beth Murphy, Mike Perko and John Wong from the FCC's Media Bureau.

We discussed a variety of standards issues needing technical modifications in the cable MSO-consumer electronics industry Agreement and draft regulations on "Plug and Play" DTV/cable compatibility recommended for adoption into the FCC rules, which are the subject of the above-referenced dockets. The issues we discussed were those in the two documents that we distributed to the above-named staff members, which are here attached.

Respectfully submitted,



Valerie Schulte

cc: Rick Chessen

Attachments

## **Issues with the Standards the Plug and Play MOU suggests be adopted into the FCC Rules.**

Each of the standards (Referenced Standards) listed in the MOU in turn have mandatory elements incorporated by reference (called Normative References), which in turn have Normative References. Adoption of the Referenced Standards into the FCC rules, absent any restrictions on that incorporation, brings the entire chain of mandatory requirements into the rules. It is important to both have the correct set of references and to make a decision about the contents so incorporated as part of the rules.

NAB has examined a number of the Normative References in the Referenced Standards for issues that may impact consumer access to broadcast programming. This is a starting point for examining all elements (i.e., the 2<sup>nd</sup>, 3<sup>rd</sup>, etc., layer of references) that would be incorporated by reference by placing a Referenced Standard in the FCC rules. NAB is providing a spreadsheet with information about the elements that NAB has examined.

Some of the categories of problems in the Referenced Standards that the FCC should carefully consider and resolve are:

1. The documentation referencing inconsistencies, such as:
  - a. Some of the designations for the Referenced Standards are for obsolete versions. New versions of the Referenced Standards have been incorporated the “as amended by” documents listed in the MOU;
  - b. Many of the Normative References in the Referenced Standards have different designations than that shown – even in the updated versions of the Referenced Standards;
  - c. The errors of omission where elements of the Normative References are not actually mandated by the standard but are critical to interoperability. Generally, the Normative References are not wholly incorporated, but rather only selected parts are specifically mentioned by text within standards. Where a mandatory verb is used in such text, it is clear. However, when other verbs are used, different readers may interpret differently whether or not the element is mandatory. If interpretations differ, this can lead to lack of interoperability. Also, as these issues are discovered one-by-one, changes to clarify will be made on an expedited basis by the standards-developing organizations. Some means to address these changes will need to be established to prevent these clarifications from differing from the FCC rules, as identifying what will be misinterpreted is not practical.
2. The inconsistency with previous FCC decisions with respect to how cable is required to carry closed captions vs. SCTE 40’s provisions;

3. The appropriateness of forcing cable operators that have all channels in their 750Mhz system active to use QAM and prevent use of VSB. Adoption of these Referenced Standards (with their Normative References), without carving out an exception does so.
4. The policy decisions about whether or not a broadcast stream can be changed when must-carried by cable should not be impacted by adopting standards for cable-originated transport streams that prejudge the matter. The constraints on MPEG-2 placed by the Referenced Standards and the constraints on MPEG-2 placed by the FCC rules for broadcast are not the same (though attempts were made to modify SCTE 54 to be the same as A/53 and A/65; other Referenced Standards have not been subjected to this process). Receivers must be able to process streams formatted in accordance with either. The rules adopting the Referenced Standards should not force modifications of broadcast streams.
5. The policy ramifications resulting from the adoption of mandatory elements of these standards, i.e., may either inadvertently make other policy decisions or may inadvertently constrain policy decisions in other proceedings.

**Matrix of Selected Standards proposed for adoption into the FCC regulations by the Plug and Play MOU (CS 97-80)**

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| 1 | <b>Standard proposed for FCC rules (Main Reference)</b>   | <b>Standard's Section</b> | <b>Normative Reference as listed in Currently Approved version of Standard listed in MOU</b> | <b>Issue</b>   | <b>Comment</b>   |
| 2 | <i>This shade means there was no issue of note. However normative references within these references were not checked so other issues may exist that are related to them. All normative references in the Referenced Standards were listed for information.</i> |                           |  |  |  |
| 3 | SCTE 40 2001 +DVS535(10/29/02)  |                           | updated version is SCTE40 2003 from which these reference numbers were taken.                |  |  |
| 4 | SCTE 40 2001 +DVS535(10/29/02)  | 1                         | Not Applicable   | A policy decision about what modulation is allowed/not allowed to be used on cable could be made if this standard was adopted without an appropriate reservation. This Voluntary Standard (SCTE40) describes how QAM systems shall work. The standard explicitly does not preclude other modulation systems. SCTE 40's assertion of what is and is not covered (by it) only has meaning within a set of voluntary standards, because other methods covered by other standards or even non-standard methods can also be used. However, if SCTE 40 becomes an FCC rule that describes how cable systems must work, then QAM may be mandated for digital cable to the exclusion of other options. | To maintain the intent of the industry consensus SCTE 40 documents, the FCC should allow, but not require, other modulation methods to be used on cable systems. Use of VSB avoids the expense of a multiplexer. The FCC rules could cite CEA 818D Part 1 for technical parameters for VSB operation on cable or leave the VSB rules as a voluntary standard. This point is mentioned again below when it relates to other standards that SCTE 40 includes by reference that have the same impact. |

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| 5  | SCTE 40 2001 +DVS535(10/29/02)                   | 8.8.2                  | Not Applicable  | This section is inconsistent with the prior FCC ruling on Closed Captioning (CC) in the R&O in ET Docket No. 99-254 and MM Docket No. 95-176 which rejected DVS 157(now SCTE 20)-style closed captions. The standard allows just 157-style captions to be used instead of A/53B style captions (it also allows just A/53B style and both). | The FCC should take exception to the standard's language in this section as it allows the option which was rejected. Making it clear in the exception that the FCC rules allow DVS157-style captions to be present, but only when simulcast when A/53-style CC are also present. |
| 6  | SCTE 40 2001 +DVS535(10/29/02)                   | 6.1                    | EIA-23  | none   |  |
| 7  | SCTE 40 2001 +DVS535(10/29/02)                   | 6.2                    | EIA/CEA-542-A   | Current version is CEA-542-B   | Also current FCC rules <76.605> cite IS 132. Those references to IS 132 should be replaced with the correct reference, CEA-542-B.  |
| 8  | SCTE 40 2001 +DVS535(10/29/02)                   | 8.8.1                  | EIA/CEA-608-B   |  |  |
| 9  | SCTE 40 2001 +DVS535(10/29/02)                   | Not referenced in text | EIA/CEA-708-B   |  |  |
| 10 | SCTE 40 2001 +DVS535(10/29/02)                   | Not referenced in text | EIA/CEA-766-A   |  |  |
| 11 | SCTE 40 2001 +DVS535(10/29/02)                   | Not referenced in text | SCTE 01 1996  |  |  |

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| 12 | SCTE 40 2001 +DVS535(10/29/02)                          | 6.3.1                     | SCTE 07 2000 (DVS031)  | This reference and the direct language in the section referencing it would prohibit use of 8VSB on cable if the FCC does not either exclude or modify the language (i.e., it may effectively result in a policy decision) | See above at line 4.  |
| 13 | SCTE 40 2001 +DVS535(10/29/02)                          | 8.7                       | SCTE 18 2001 (DVS208)  | This section of SCTE 40 by including SCTE 18 by reference requires cable operators to insert the Emergency Alert table into transport streams originating from Broadcasters.  | While this is a reasonable technical solution, provided no bits are removed, and the buffer models are not violated; alteration of each broadcaster's bit stream is a policy matter.          |
| 14 | SCTE 40 2001 +DVS535(10/29/02)                          | Not referenced in text.   | SCTE 20 2001 (DVS157)  | The FCC decided to not allow DVS157-style closed captions to be used instead of A/53-style captions the R&O in ET Docket No. 99-254 and MM Docket No. 95-176. This standard documents the rejected alternative.           | Clarify any misunderstanding by taking an exception to the reference.   |
| 15 | SCTE 40 2001 +DVS535(10/29/02)                          | Not referenced in text    | SCTE 21 2001 (DVS053)  | Eliminate this reference as not applicable to digital carriage  | Consider if other NTSC rules that are contained in SCTE 40 should be addressed (consistency between FCC rules and this standard's NTSC requirements were not investigated for this document). |

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| 16 | SCTE 40 2001 +DVS535(10/29/02)                   | 8.1                | SCTE 43 2003 (DVS258)   |   | Establishes a set of video formats.   |
| 17 | SCTE 40 2001 +DVS535(10/29/02)                   | 8.8.2              | SCTE 43 2003 (DVS258)   | SCTE 43 explicitly allows carriage of CC using either SCTE 20 (DVS157) or A/53. | An exception or an assertion about this matter needs to be in any rules that include SCTE 40 (and therefore SCTE 43 included by reference which in turn points to SCTE 20) so that the rules are consistent with the R&O in ET Docket No. 99-254 and MM Docket No. 95-176. Make clear DTV closed captions shall be per A/53B and CEA708B and that those rules apply to all DTV shows, including those produced for NTSC that are sent over Digital Transports (i.e., advanced captions do not apply just to HDTV formats). Allow 157-style CC to optionally be present only when A/53 style captions are present for backwards compatibility. |
| 18 | SCTE 40 2001 +DVS535(10/29/02)                   | 7.1, 8.3, 8.9      | SCTE 54 2003 (DVS241)   |   | SCTE 54 is one of the references directly cited by the MOU  |
| 19 | SCTE 40 2001 +DVS535(10/29/02)                   | 6.3.3              | SCTE 55-1 2002 (DVS178)   |   |   |
| 20 | SCTE 40 2001 +DVS535(10/29/02)                   | 6.3.3              | SCTE 55-2 2002 (DVS234)   |   |   |
| 21 | SCTE 40 2001 +DVS535(10/29/02)                   | 8.5                | SCTE 65 2002 (DVS208)   |   | SCTE 65 is one of the references directly cited by the MOU  |

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| 22 | SCTE 40 2001 +DVS535(10/29/02)                   | 8.1                    | A/52A   | Not actually mandated by specific text reference, but strong inference exists.  | Defacto standard about which there is little question  |
| 23 | SCTE 40 2001 +DVS535(10/29/02)                   | 8.1                    | A/53B   | Current version of A/53B includes Amendment 1 and Amendment 2. Not actually mandated by specific text reference as only an informative statement is made, but strong inference that this is operative exists. | At a minimum should add Amendment 1 to match the version currently adopted in the FCC rules. Amendment 2 has been approved by the ATSC and should be included. |
| 24 | SCTE 40 2001 +DVS535(10/29/02)                   | Not referenced in text | A/65A   | Current version is A/65B.   | As A/65 is not referenced in text, SCTE 40 is silent on carriage of PSIP data.   |
| 25 | SCTE 40 2001 +DVS535(10/29/02)                   | 7.1                    | ISO/IEC 13818-1:2000  |   |  |
| 26 | SCTE 40 2001 +DVS535(10/29/02)                   | 8.1                    | ISO/IEC 13818-2:2000  |   |  |
| 27 | SCTE 40 2001 +DVS535(10/29/02)                   | Not referenced in text | ISO/IEC 13818-2:2000 Cor.1:2002   |   |  |
| 28 | SCTE 40 2001 +DVS535(10/29/02)                   | Not referenced in text | ISO/IEC 13818-6:1998  |   |  |

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| 1  |   |                           |  |   |  |
| 29 | SCTE 40 2001 +DVS535(10/29/02)                          | 6.3.1                     | ITU-T J.83B (04/97)  | Mandates that all digital signals use QAM modulation. If the FCC adopts the standard without reservation this section would preclude the use of VSB on cable.   | An exception in the FCC regulations to the text of section 6.3.1 of SCTE 40 to permit modulation methods per A/53B (as amended) and CEA 818D is necessary to preserve the option of the other modulation modes which are included in other parts of this standard (for example, see Table 5.28).   |
| 30 |   |                           |  |   |  |
| 31 |   |                           |  |   |  |
| 32 | SCTE 65 2002 (was DVS234)                               |                           | Not Applicable   | The MOU says that Profiles 1 through 3 in this Standard, when used, must have the Source Name Subtable - a table the standard did not require for these profiles. The MOU also says that the February 2000 PSIP Agreement shall be followed, as long as it does not limit the requirements in the Referenced Standards. The February 2000 PSIP Agreement adds the requirement to support Profiles 4 or higher. Required use of profiles is not clear. | While we see the benefits to adding the source name table, what is actually required is not clear. It appears that when event information data is sent out of band, the out of band transport must comply with profile 4 or higher and only when there is no event data may the lower profiles be used. The decision about whether or not event data must be carried for broadcast signals under the must-carry rules seems to be a policy matter. |

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| 33 | SCTE 65 2002 (was DVS234)                        | 2                      | Not Applicable  | The section that lists the references for this standard characterizes them as "applicable" and they therefore are generally NOT normative unless the paragraph that cites a particular provision so states. | Some implementers may assume that all parts of the normative references are to be complied with and others may read more carefully for the minimum they must implement, potentially leading to interoperability issues. It should be made clear which parts are meant to be mandatory. |
| 34 | SCTE 65 2002 (was DVS234)                        | 5.6, 5.7, 6.2          | Not Applicable  | re-use of table id numbers with differing semantics   | context of re-use needs to be carefully respected - it must not be possible to interpret a rule that requires a table defined only for out of band use to have the same meaning or be required in any other context  |
| 35 | SCTE 65 2002 (was DVS234)                        |                        | Not Applicable  |   | no mention of the rc_descriptor  |
| 36 | SCTE 65 2002 (was DVS234)                        | 5.6                    | ISO 13818-1(1994)   | The 1994 version has been superceded.   | Current accepted version is ISO/IEC 13818-1:2000   |
| 37 | SCTE 65 2002 (was DVS234)                        | Not referenced in text | ISO 13818-2(1994)   | The 1994 version has been superceded.   | Current accepted version is ISO/IEC 13818-2:2000   |
| 38 | SCTE 65 2002 (was DVS234)                        | 6.3                    | A/52 (1995)   | Current version is A/52A  |  |
| 39 | SCTE 65 2002 (was DVS234)                        | 5.6, 6.3, 5.1.2        | A/53 (1995)   | Current version is A/53B Plus A1 and A2.  | Parts of A/53B are included by reference, in particular the 8 and 16-VSB parts.  |
| 40 | SCTE 65 2002 (was DVS234)                        | Not referenced in text | DVS 022, A/56 (1996)  |   |  |

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| 41 | SCTE 65 2002 (was DVS234)                               | 5.6, 7.2                  | DVS 031 (1997)   | Current version is SCTE 07 2000   |   |
| 42 | SCTE 65 2002 (was DVS234)                               | Not referenced in text    | DVS097 (A/65 (1997))   | Replaced by A/65B                 | SCTE version of standard withdrawn, and this reference should not be part of the rules. |
| 43 | SCTE 65 2002 (was DVS234)                               | Not referenced in text    | DVS 178r2 (2000)   | Current version is ANSI/SCTE 55-1 |   |
| 44 | SCTE 65 2002 (was DVS234)                               | Not referenced in text    | DVS 188 (1998)   |                                   | input document - never approved   |
| 45 | SCTE 65 2002 (was DVS234)                               | 1.2, 3.2                  | DVS 131r7 (1998)   | Current version is SCTE 55-2      |   |
| 46 | SCTE 65 2002 (was DVS234)                               | 4.1                       | DVS 208r6 (1999) (EIA 814)   | Current version is SCTE 18 2002   |   |
| 47 | SCTE 65 2002 (was DVS234)                               | many                      | ISO 639 (1998)   | Current version is 639.2B         |   |
| 48 | SCTE 65 2002 (was DVS234)                               | Not referenced in text    | ISO CD 639.2 (1994)  | Current version is 639.2B         | This document was a draft of what became 639.2B. Only one of these '639s' is needed.    |
| 49 | SCTE 65 2002 (was DVS234)                               | 7.1.x                     | ISO/IEC 10646-1:1993   |                                   | Not investigated  |
| 50 | SCTE 65 2002 (was DVS234)                               | Not referenced in text    | ISO/IEC 11172-1  |                                   | Not investigated  |
| 51 | SCTE 65 2002 (was DVS234)                               | Not referenced in text    | ISO/IEC 11172-2  |                                   | Not investigated  |
| 52 | SCTE 65 2002 (was DVS234)                               | Not referenced in text    | ISO/IEC 11172-3  |                                   | Not investigated  |
| 53 | SCTE 65 2002 (was DVS234)                               | Not referenced in text    | ISO/IEC 13818-3  |                                   | Not investigated  |
| 54 | SCTE 65 2002 (was DVS234)                               | Not referenced in text    | ISO/CD 13522-2:1993  |                                   | Not investigated  |

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| 55 | SCTE 65 2002 (was DVS234)                               | many                       | ISO/IEC 8859, parts 1-10   |   | Not investigated   |
| 56 | SCTE 65 2002 (was DVS234)                               | 5.1.2                      | ITU-T Rec J.83: 1995   | requires QAM- policy matter                                     | see comments in SCTE 40 section (row 4) for details/policy implications            |
| 57 | SCTE 65 2002 (was DVS234)                               | Not referenced in text     | ITU-R Rec. BO.1211:1995  |   | Not investigated   |
| 58 | SCTE 65 2002 (was DVS234)                               | not normatively referenced | EIA-766  |   |  |
| 59 |   |                            |  |   |  |
| 60 |   |                            |  |   |  |
| 61 | SCTE 54 2002 +DVS/435r4                                 |                            |  | Current version is 2003 from which these references were taken. | The cited version should be ANSI/SCTE 54 2003.                                     |
| 62 | SCTE 54 2002 +DVS/435r4                                 | 7                          | SCTE 07 2000 (DVS031)  |   |  |
| 63 | SCTE 54 2002 +DVS/435r4                                 | 5.7.2, 5.8.1               | SCTE 18 2001 (DVS208)  |   |  |
| 64 | SCTE 54 2002 +DVS/435r4                                 | 5.8.2                      | SCTE 19 2001 (DVS 132)   |   | stream type only aspect included by reference                                      |
| 65 | SCTE 54 2002 +DVS/435r4                                 | 5.8.2                      | SCTE 27 1996 (DVS026)  |   | stream type only aspect included by reference                                      |
| 66 | SCTE 54 2002 +DVS/435r4                                 | 5.8.3                      | SCTE 42 2002 (DVS311)  |   | descriptor tag value only aspect included by reference                             |
| 67 | SCTE 54 2002 +DVS/435r4                                 | 5.8.3                      | SCTE 53 2002 (DVS051)  |   | descriptor tag value only aspect included by reference                             |
| 68 | SCTE 54 2002 +DVS/435r4                                 | 5.3, 5.8.x, 6.1            | A/52A  |   |  |
| 69 | SCTE 54 2002 +DVS/435r4                                 | 5.8.3.6, 5.8.2.2           | A/53B  | Current version includes Amendment 1 and Amendment 2            | Parts of A/53B but not the major transport elements are incorporated by reference. |

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| 70 | SCTE 54 2002 +DVS/435r4                                 | 5.7.1, 5.8.1, 5.8.3, 5.8.4 | A/65A  | Current version is A/65B   |  |
| 71 | SCTE 54 2002 +DVS/435r4                                 | 5.8.2                      | A/90 (2000)  |  | stream type only aspect included by reference  |
| 72 | SCTE 54 2002 +DVS/435r4                                 | Not referenced in text     | EIA-708-B  |  |  |
| 73 | SCTE 54 2002 +DVS/435r4                                 | 5.7.1                      | EIA/CEA-766-A  |  |  |
| 74 | SCTE 54 2002 +DVS/435r4                                 | many                       | ISO/IEC 13818-1:2000   |  | this (SCTE 54 2003) is the Standard that properly and correctly incorporates by reference and constrains the 13818-1 standard, and does so in a manner very close to A/53B as amended. |
| 75 | SCTE 54 2002 +DVS/435r4                                 | 5.8.2                      | ISO/IEC 13818-2:2000   |  | stream type only aspect included by reference  |
| 76 | SCTE 54 2002 +DVS/435r4                                 | 5.8.2                      | ISO/IEC 13818-6:1998   |  | stream type only aspect included by reference  |
| 77 |   |                            |  |  |  |
| 78 |   |                            |  |  |  |
| 79 | ANSI/SCTE 28 2001 +DVS519r2                             |                            |  | Current version is 2003 from which these references were taken. Another amendment is in process as of June 2003. | Note only cable systems that are required to provide PODs should be required to meet this standard.  |
| 80 | ANSI/SCTE 28 2001 +DVS519r2                             | 5.6, 8.12.1.12             | SCTE 18 2002 (DVS208)  | Superseded by ANSI-J-STD 042-2002  |  |
| 81 | ANSI/SCTE 28 2001 +DVS519r2                             |                            | SCTE 23-3 2002   |  | Not Investigated   |

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| 82 | ANSI/SCTE 28 2001 +DVS519r2                      | 3.1, 8.7               | SCTE 41 2001 (DVS301)   |  | Parts of EIA 679-B are replaced with this reference (SCTE 41) by SCTE 28's text  |
| 83 | ANSI/SCTE 28 2001 +DVS519r2                      | Not referenced in text | SCTE 54 2003 (DVS241)   |  |  |
| 84 | ANSI/SCTE 28 2001 +DVS519r2                      |                        | SCTE 55-1 2002 (DVS178)   |  | Not Investigated   |
| 85 | ANSI/SCTE 28 2001 +DVS519r2                      |                        | SCTE 55-2 2002 (DVS234)   |  | Not Investigated   |
| 86 | ANSI/SCTE 28 2001 +DVS519r2                      | 5.5, 8.12.7.3          | SCTE 65 2002 (DVS208)   | SCTE 65 has profiles, the selection of which per Feb 2000 PSIP Agreement should be 4 or 5 when event data is provided. (see row 32)  | SCTE 65 claims that profile 5 and lower are each compatible with cable devices deployed by 2000.(not an SCTE 28 issue per se but is an SCTE 65 issue).                                       |
| 87 | ANSI/SCTE 28 2001 +DVS519r2                      |                        | SCTE 90-1 2003  | This standard is present in the reference list only because it is mentioned as a functionality that if supported (which is not required) a certain IP flow shall be supported. | SCTE-90-1 should have been an informative reference. It must be made clear that this is method of providing interactive applications is not mandated by explicitly excluding this reference. |

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| 88  | ANSI/SCTE 28 2001 +DVS519r2                             |                           | ISO/IEC 13818-6:1998   |   | Not Investigated  |
| 89  | ANSI/SCTE 28 2001 +DVS519r2                             |                           | ISO 8859-1 (1987)  |   | Not Investigated  |
| 90  | ANSI/SCTE 28 2001 +DVS519r2                             |                           | RFC 2131 (1997)  |   | Not Investigated  |
| 91  | ANSI/SCTE 28 2001 +DVS519r2                             |                           | RFC 2132 (1997)  |   | Not Investigated  |
| 92  | ANSI/SCTE 28 2001 +DVS519r2                             |                           | DOCSIS - SP-DSG-IO1-02228  |   | Not Investigated  |
| 93  | ANSI/SCTE 28 2001 +DVS519r2                             |                           | several PCMCIA card standards  |   | Not Investigated  |
| 94  |   |                           |  |   |   |
| 95  |   |                           |  |   |   |
| 96  | ANSI/SCTE 41 2001 +DVS301r4                             |                           |  | Current version is 2003 from which these references were taken. | Note only cable systems that are required to provide PODs should be required to meet this standard. |
| 97  | ANSI/SCTE 41 2001                                       |                           | SCTE 28 2001   |   | Not Investigated  |
| 98  | ANSI/SCTE 41 2001 +DVS301r4                             |                           | EIA 679-B (2000)   |   | Not Investigated  |
| 99  | ANSI/SCTE 41 2001 +DVS301r4                             |                           | ITU-T Rec. X.509   |   | Not Investigated  |
| 100 | ANSI/SCTE 41 2001 +DVS301r4                             |                           | FIPS PUB 46-3 (1999)   |   | Not Investigated  |
| 101 | ANSI/SCTE 41 2001 +DVS301r4                             |                           | PS-PUB 81 (1980)   |   | Not Investigated  |
| 102 | ANSI/SCTE 41 2001 +DVS301r4                             |                           | FIPS PUB 140-1 (2001)  |   | Not Investigated  |
| 103 | ANSI/SCTE 41 2001 +DVS301r4                             |                           | FIPS PUB 180-1 (1995)  |   | Not Investigated  |

**Matrix of Selected Standards proposed for adoption into the FCC regulations by the Plug and Play MOU (CS 97-80)**

|     | A   | B                         | C  | D            | E   |
|-----|---|---------------------------|--|--------------|---|
| 1   | <b>Standard proposed for FCC rules (Main Reference)</b> | <b>Standard's Section</b> | <b>Normative Reference as listed in Currently Approved version of Standard listed in MOU</b> | <b>Issue</b> | <b>Comment</b>  |
| 104 | ANSI/SCTE 41 2001 +DVS301r4                             |                           | FIPS PUB 186-2 (2000)  |              | Not Investigated  |
| 105 | ANSI/SCTE 41 2001 +DVS301r4                             |                           | RSA1 (1993)  |              | Not Investigated  |
| 106 | ANSI/SCTE 41 2001 +DVS301r4                             |                           | ISO/IEC 13818-1:2000   |              | Not Investigated  |
| 107 |   |                           |  |              |   |
| 108 |   |                           |  |              |   |
| 109 | SCTE26 2001 (DVS194)                                    |                           |  |              | This standard is silent on closed captioning delivery across the 1394 interface. The actual captions are part of video so they should arrive, but choice among them is enabled by the caption service descriptor. However delivery of the caption service descriptor is not required. The policy matter of how a broadcaster-placed CC descriptor (in the EIT) is handled by the cable head end when broadcast signals are processed for QAM transmission is open. There is a similar issue for the content advisory which SCTE 26 requires to be sent, but how to do so is undefined. The MOU asserts that PSIP data from broadcasters is passed over the RF interface, so, to be consistent, the 1394 interface should also carry PSIP data. Requirements to carry all PSIP data related to the selected program should be added. |
| 110 | SCTE26 2001 (DVS194)                                    |                           | IEEE 1394-1995   |              | Not Investigated  |
| 111 | SCTE26 2001 (DVS194)                                    |                           | IEEE 1394a-2000  |              | Not Investigated  |
| 112 | SCTE26 2001 (DVS194)                                    |                           | IEC61883   |              | Not Investigated  |
| 113 | SCTE26 2001 (DVS194)                                    |                           | RFC2734  |              | Not Investigated  |
| 114 | SCTE26 2001 (DVS194)                                    |                           | 5C spec  |              | Not Investigated  |
| 115 | SCTE26 2001 (DVS194)                                    |                           | AV/C Ver. 3 1998   |              | Not Investigated  |
| 116 | SCTE26 2001 (DVS194)                                    |                           | Enhance AV/C Ver. 3 Ver. 1.1 2000  |              | Not Investigated  |

**Matrix of Selected Standards proposed for adoption into the FCC regulations by the Plug and Play MOU (CS 97-80)**

|     | A  | B                  | C   | D  | E   |
|-----|--|--------------------|---|--|---|
| 1   | Standard proposed for FCC rules (Main Reference) | Standard's Section | Normative Reference as listed in Currently Approved version of Standard listed in MOU | Issue  | Comment   |
| 117 | SCTE26 2001 (DVS194)                             |                    | ISO/IEC 13818-1:1996  |  | Not Investigated  |
| 118 | SCTE26 2001 (DVS194)                             |                    | A/53 +Amd 1 (2000)  | Current version is A/53B plus Amendment and Amendment 2. |   |
| 119 | SCTE26 2001 (DVS194)                             |                    | EIA 775A  |  |   |
| 120 | SCTE26 2001 (DVS194)                             | 3, 5.3.1           | EIA 799   |  | Note that this Referenced Standard mandates EIA-799, but the MOU made the bit-mapped graphics required by EIA-799 optional, so a narrow exception needs to be clearly made with respect to both these sections in SCTE 26 to avoid any apparent conflict. |
| 121 | SCTE26 2001 (DVS194)                             |                    | DVS 301r2   | Current version is SCTE 07 2000                          |   |
| 122 | SCTE26 2001 (DVS194)                             |                    | DVS 241r1   | Current version is SCTE 54 2003                          |   |
| 123 | SCTE26 2001 (DVS194)                             |                    | DVS 258r3   | Current version is SCTE 43 2003                          |   |