

December 15, 2004

Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12th Street, SW  
Washington, DC 20554

*Ex Parte Notice*

Re: Implementation of Section 304 of the Telecommunications Act of 1996:  
Commercial Availability of Navigation Devices, CS Dkt. No. 97-80

Dear Ms. Dortch:

In accordance with Section 1.1206(b)(2) of the Commission's rules, this letter reports on three meetings involving representatives of Comcast Corporation ("Comcast") and certain FCC Commissioners and staff over the past two days. Comcast was represented in each meeting by Mark Coblitz, Senior Vice President of Strategic Planning, James Coltharp, Chief Policy Advisor, FCC & Regulatory Policy, and the undersigned. Comcast's representatives met with Ken Ferree, Bill Johnson, Deborah Klein, Rick Chessen, and John Wong of the Media Bureau on December 14, and they met with Commissioner Adelstein and his Legal Advisor, Johanna Mikes Shelton, and with Commissioner Martin and his Senior Legal Advisor, Dan Gonzales, on December 15.

Comcast's representatives explained that the statutory objective of ensuring the competitive availability of navigation devices can be and is being achieved, independent of any prohibition on the deployment by cable operators of set-top boxes with integrated security, that the cable industry is fully honoring its commitment to support CableCARDS and to work assiduously on negotiation of a two-way plug-and-play agreement, that imposition of the integration ban would increase costs to consumers and restrict the choices available to them, and that the integration ban would impede development of a low-cost digital set-top box and delay the digital transition. For these reasons, and with reference to the arguments previously presented on the public record by the National Cable and Telecommunications Association and some of its other members, they urged the Commission to defer the integration ban for a minimum of 18 months if it is not yet persuaded of the need to eliminate the integration ban altogether.

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Please let me know if you have any questions.

Respectfully submitted,

/s/

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cc: Commissioner Martin  
Commissioner Adelstein  
Rich Chessen  
Ken Ferree  
Dan Gonzales  
Bill Johnson  
Deborah Klein  
Johanna Mikes Shelton  
John Wong