

December 23, 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 a telephone conversation that took place yesterday between Brian Roberts, President, Chief Executive Officer, and Chairman of the Board of Comcast Corporation, and FCC Chairman Michael Powell. Mr. Roberts called Chairman Powell to underscore Comcast's belief that the Commission should not prohibit cable operators from deploying set-top boxes with integrated security. Summarizing facts and arguments that have been detailed on the public record in previous submissions by Comcast, the National Cable and Telecommunications Association ("NCTA"), and other NCTA members, Mr. Roberts explained that the competitive availability of navigation devices is already being achieved through the use of CableCARDS, that Comcast and other cable companies are successfully forging close relationships with consumer electronics manufacturers and retailers, and that imposition of the integration ban would adversely affect consumers, impede technological progress, and skew competition in the delivery of video services.

Please let me know if you have any questions.

Respectfully submitted,

/s/

James L. Casserly
Willkie Farr & Gallagher LLP
1875 K Street, NW
Washington, DC 20006
(202) 303-1119

cc: Chairman Powell
Jon Cody