

February 3, 2005

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:

Yesterday, Brian Roberts, President, Chief Executive Officer, and Chairman of the Board of Comcast Corporation (“Comcast”), briefly discussed the above-captioned proceeding in meetings with Chairman Powell, Commissioner Abernathy and Matt Brill, and Commissioner Martin and Catherine Bohigian. Mr. Roberts was accompanied by Kerry Knott, Comcast’s Vice President, Federal Government Affairs, James R. Coltharp, Comcast’s Chief Policy Advisor, FCC & Regulatory Policy, and the undersigned for the meeting with Commissioners Abernathy and by Messrs. Knott and Coltharp for the meeting with Commissioner Martin.

Mr. Roberts emphasized that competitive market imperatives have impelled Comcast and other cable operators to establish cooperative and mutually beneficial relationships with consumer electronics manufacturers and retailers. Comcast is committed to continued cable support for CableCARDS, including both those that are currently being provided under the one-way plug-and-play agreement and also the multistream cards that will be used in products planned by Samsung and LG Electronics. At the same time, Comcast’s desire to make “all-digital” delivery of video programming available to all households in an economically efficient manner requires successful development of a next-generation network architecture (“NGNA”) security for cable services that is reliable, renewable, and downloadable and the development of very low-cost digital set-top boxes. Mr. Roberts emphasized that implementation of the ban on cable operator deployment of set-top boxes with integrated security would divert industry resources away from downloadable security and low-cost digital boxes, delay widespread, affordable consumer access to all-digital cable services, and unnecessarily increase costs to consumers.

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Please let me know if you have any questions.

Respectfully submitted,

/s/ James L. Casserly

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cc: Chairman Powell
Commissioner Abernathy
Commissioner Martin
Catherine Bohigian
Matt Brill