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March 1, 2005

ELECTRONICALLY FILED

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

**Re: Implementation of Section 629 of the Communications Act:
Commercial Availability of Navigation Devices, CS Docket No. 97-80**

Dear Ms. Dortch:

On behalf of TTE Corporation, the manufacturer of RCA television products, the undersigned had a telephone conversation on February 28, 2005 with Jon Cody, Legal Advisor to Chairman Powell, concerning the July 1, 2006 deadline by which cable operators are prohibited from sale or lease of integrated cable set top boxes under current FCC regulations implementing Section 629 of the Communications Act. I reiterated the fundamental importance of the principle of common reliance by cable operators and consumer electronics manufacturers in achieving a competitive marketplace for navigation devices as mandated by the Congress. I also observed that implementation of Section 629 may well be the longest delayed meaningful implementation by the Commission of any provision of the 1996 Telecommunications Act. I further maintained that yet another delay in the implementation date was not necessary to facilitate the availability of a downloadable security solution. To the contrary, retaining the July 1, 2006 deadline actually would serve as a catalyst to development of a downloadable security solution that would be employed by cable operators and consumer electronics manufacturers alike.

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This letter is being filed pursuant to Section 1.1206(b)(2) of the Commission's Rules.

Respectfully submitted,

A handwritten signature in black ink that reads "Lawrence R. Sidman". The signature is written in a cursive style with a large initial 'L' and 'S'.

Lawrence R. Sidman
of PAUL, HASTINGS, JANOFSKY & WALKER LLP

cc: Jon Cody, Legal Advisor to FCC Chairman Michael Powell