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March 14, 2005

ELECTRONICALLY FILED

Ms. 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 met with Jordan Goldstein, Legal Advisor to Commissioner Copps, on March 11, 2005 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. Additionally, the undersigned and Dave Arland, Vice President for Communications and Government Affairs for Thomson Inc.'s Connectivity Business Unit, met today with Eric Bash, Legal Advisor to Commissioner Adelstein, regarding the same subject.

During these meetings, we 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. We 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. We 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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We indicated that the record before the Commission was not sufficient to justify the grant of a 12-month extension of the current deadline based upon the ill-defined promise of a downloadable, software security solution. Rather than granting an extension based upon a proprietary solution subject to a non-disclosure agreement and therefore effectively insulated from meaningful comment and Commission analysis, we suggested that the Commission's regulations, 47 CFR § 76.1207, provide an alternative and appropriate, if not required, mechanism for Commission consideration of any further delay. Utilizing the specific waiver procedures detailed in this section of the Commission's rules, the proponents would have the burden of establishing the justification for a waiver with far greater specificity.

In the event that the Commission were to determine that yet another extension of the deadline was warranted, we discussed conditions on the grant of any such extension designed to achieve the goals of Section 629 and the timely conclusion of the DTV transition.

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

Respectfully submitted,



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

cc: Jordan Goldstein, Legal Advisor to FCC Commissioner Michael Copps
Eric Bash, Legal Advisor to FCC Commissioner Jonathan Adelstein