

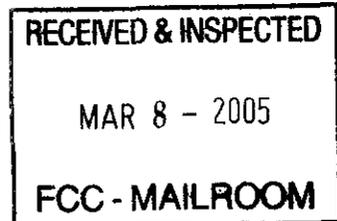
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Advance / Newhouse
communications

March 4, 2005

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



Re: Ex Parte Letter, CS Docket No. 97-80

Dear Ms. Dortch

I am writing to express support of the recommendations made by Microsoft Corporation, Comcast Corporation and Time Warner Cable in the Feb 24th, 2005 *ex parte* Notice filed in the above-captioned proceeding. We believe that the Commission should consider the recommendations offered by these companies and defer the currently-scheduled July 2006 "integration ban" for a period of at least six (6) months.

As the manager of Bright House Networks, which operates cable systems providing video, high-speed data and voice services to more than 2.2 million subscribers in Florida, Alabama, Indiana, Michigan and California, we have been and continue to be committed to the retail availability of fully-functional digital cable products that will provide value to our customers. We have also fully participated in the ongoing discussions with the CE and IT industries, and are already providing support and deploying CableCARDS for current Uni-Directional Cable-ready Products (UDCPs) across all of our systems.

We support the view expressed by Mr. Britt, Mr. Roberts and Mr. Mundie that there is an increasing sense of importance and urgency in our collective companies and industries in arriving at a full implementation of two-cable-ready products available at retail, and that implementing the ban in July 2006 will require us to devote time, money and the resources of our people to removing already-integrated conditional access functionalities from current products. Instead, we agree with that appropriate time should be given to our collective efforts to develop new downloadable software-based conditional access systems. This allows us to focus our resources on new innovations in services that will truly benefit our subscribers, delivered to products available either through retail channels or directly from our cable systems. We have

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previously expressed similar views to the Commission, as set forth in our *ex parte* filing of December 21, 2004, CS Docket 97-80.

We applaud the commitment made by Messrs. Britt, Roberts and Mundie to personally work together to supervise efforts to reach an agreement amongst the cable, CE and IT industries to ensure the availability of two-way cable products during calendar 2006. We will continue to do our part to support their efforts, and strongly hope that the Commission will accept the recommendation to defer the "integration ban" and give us the time to truly deliver on the promise of a better outcome for consumers.

Respectfully submitted,



Robert J. Miron
Chairman and CEO
Advance/Newhouse Communications

cc: Chairman Michael Powell
Mr. Jon Cody