

**Before the  
Federal Communications Commission  
Washington, D.C. 20554**

In the Matter of	)	
	)	
Implementation of Section 304 of the Telecommunications Act of 1996	)	CS Docket No. 97-80
	)	
Commercial Availability of Navigation Devices	)	
	)	
Cable Industry Report on Downloadable Security	)	DA 05-3237
	)	

**MOTION FOR EXTENSION OF TIME**

Hewlett Packard (“HP”), Intel Corporation (“Intel”), and ATI Technologies (“ATI”) (collectively, the “Companies”), by their attorneys and pursuant to Section 1.46 of the Commission’s Rules, respectfully request an extension of time for filing comments in response to the cable industry’s report on downloadable security (the “Report”), to January 20, 2006.<sup>1</sup> The Report raises several issues of importance to the information technology industry and the Commission should have the benefit of a full record as it proceeds to analyze the report and formulate its video content protection policies based in part on the cable industry’s representations contained therein. HP, Intel, and ATI intend to file comments addressing these issues and the Companies understand that other members of the computer and information technology industries will file comments as well.

Although the December 30, 2005 filing date for comments in this proceeding announced in the *Notice* is consistent with the Commission’s statement in the *Second Report and Order* in

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<sup>1</sup> Media Bureau Announces Dates for Filing Comments and Reply Comments on Cable Industry Report on Downloadable Security, DA 05-3237 (released December 20, 2005) (the “Notice”).

CS Docket No. 97-80 (FCC 05-76) that comments would be due thirty days after the report was filed,<sup>2</sup> requiring comments on that date would not allow commenters sufficient time to respond adequately to the complex technical issues raised by the Report for several reasons. First, the comment date falls only ten days after the Commission provided interested parties with official notice of the Report, and that period includes the Christmas, Hanukkah, Kwanzaa, and New Years holidays, a period when information technology companies traditionally are closed. In addition, most parties with an interest in this proceeding now are preparing for the Consumer Electronics Association's annual Consumer Electronics Show, which will take place in Las Vegas from January 5<sup>th</sup> through January 8<sup>th</sup>. Shortly thereafter, HP, Intel, ATI, and many other computer and IT companies will be participating in copy control and content protection meetings in Los Angeles between January 9<sup>th</sup> and January 12<sup>th</sup> with organizations including the Content Protection Technologies Working Group and the DVD Copy Control Association. In short, many parties with a keen interest in the issues presented by the Report will be unable to prepare comments on the Report through the first two weeks of January.

Accordingly, to ensure that the Commission is permitted to develop a full record regarding the important issues raised by the Report, and for the foregoing reasons, HP, Intel, and

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<sup>2</sup> See *Notice* (citing Implementation of Section 304 of the Telecommunications Act of 1996: Commercial Availability of Navigation Devices, 20 FCC Rcd 6794 (2005) (“*Second Report and Order*”).

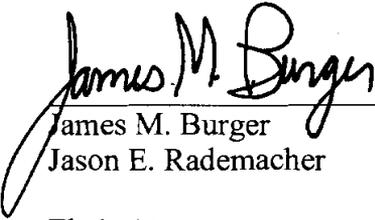
ATI request that the date for filing comments be extended to January 20, 2006 and that the date for filing reply comments be extended to February 6, 2006.

Respectfully submitted,

**HEWLETT PACKARD**

**INTEL CORPORATION**

**ATI TECHNOLOGIES**



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