



**NCTA**

NATIONAL CABLE & TELECOMMUNICATIONS ASSOCIATION

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December 29, 2005

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W.  
Washington, D.C. 20554

**Re: CS Docket No. 97-80 (Commercial Availability of Navigation Devices)**

Dear Ms. Dortch:

In its Second Report and Order in CS Docket No. 97-80,<sup>1</sup> the Commission directed the six largest multiple system operators (“MSOs”) – Comcast Corporation, Time Warner Cable, Cox Communications, Charter Communications, Adelphia Communications, and Cablevision Systems Corporation – to file with the Commission “reports detailing CableCARD deployment and support” as well as “the effort to develop and deploy a multistream CableCARD.”<sup>2</sup> The Commission noted that the six “cable operators may file separate reports or a joint report.” As was done with the first set of reports filed on October 3, 2005, as a matter of convenience, NCTA has compiled the individual company reports and is submitting them as attachments to this letter. Should the Commission have questions about any of these reports, please contact me and I will ensure that the questions are forwarded to the appropriate person at the relevant company for a response.

**CableCARD Deployment and Support.** CableCARD-enabled products were launched less than eighteen months ago, in the late summer of 2004. In the relatively short time between then and November 30, 2005, the six largest MSOs – those which are reporting today and which serve over 80% of the cable subscribers in the country – had deployed over 84,000 CableCARDS. When the CableCARDS deployed by the next four largest companies are included, *there were over 90,000 CableCARDS deployed by cable operators as of November 30, 2005 and will be over 100,000 CableCARDS deployed by year-end 2005.* In addition, over twenty consumer electronics manufacturers have had over 375 models of CableCARD-enabled products (including Digital Cable Ready DTV sets) certified or verified.

<sup>1</sup> *Implementation of Section 304 of the Telecommunications Act of 1996: Commercial Availability of Navigation Devices*, Second Report and Order, 20 FCC Rcd 6794 (2005).

<sup>2</sup> *Id.* at 21-23 (¶¶ 39, 44). In that Order, the Commission noted that the effective dates for its reporting requirements would be subject to OMB approval. In a subsequent Public Notice (DA 05-1930, released July 1, 2005), the Commission set October 3 (actually October 1 which fell on a Saturday) as the date when the six cable companies should file their first reports.

As described in the attached reports, the six reporting cable operators have internal teams assigned to CableCARD support issues, as well as business processes to identify and resolve issues as they arise. In addition to individual company efforts, as we reported in our October 3, 2005 submission, the cable industry has instituted a structured and collaborative process to deal with CableCARD deployment and support issues. Since January 2004, NCTA and CableLabs have held weekly conference calls with MSO engineering and operations personnel involved in the fielding and support of CableCARD devices. These calls serve as a forum for sharing lessons learned and best practices, elevating issues for resolution, and disseminating information from manufacturers on software and hardware fixes as problems are identified. In addition, since January 2005, the cable and CE industries have worked together to share information regarding technical issues with CableCARDs, host devices, and the cable plant so that both industries – and their individual member companies – can better respond in a consistent way to problems that may arise when CableCARDs are installed in Host devices. Moreover, the two industries have shared contact lists of senior engineering personnel at each MSO and CE manufacturer to provide direct lines of communication for problem resolution. Finally, CableLabs personnel have acted as a liaison between the MSOs and CE manufacturers and have established a process which is responsive to the needs of both MSOs and CE manufacturers. This relationship has facilitated the timely identification, investigation and resolution of many of the implementation issues that have been raised with respect to host devices, CableCARDs and cable systems.

**Multistream CableCARDs.** The Commission also asked for a report on the “effort to develop and deploy a multistream CableCARD.” We are pleased to present the following information in response to that request. Multistream cards enable the descrambling of two or more video streams at once; so, for instance, a viewer could watch one premium channel while recording another. As previously reported, the specifications for multistream CableCARDs and the multistream CableCARD interface are complete. The “M-card” will operate in a backwards compatible, single-stream manner with single stream devices (for example, in a Unidirectional Digital Cable-Ready Product); or in the multistream manner with multistream devices. *See* CableCARD™ Interface 2.0 Specification OC-SP-CCIF2.0-I03-051117, <http://www.opencable.com/specifications/>.

In October 2005, a preliminary HPNx Pro (multistream test tool) prototype was submitted to CableLabs. The HPNx Pro is expected to be officially validated for use in mid-2006. (The HPNx Pro test tool greatly facilitates the work needed by a CE manufacturer to install a multistream interface on a retail device. This test tool will be available to be used by CE manufacturers to aid them in the development of multistream CableCARD capability in their devices.) Samples of the multistream CableCARD were submitted to CableLabs for preliminary testing and interoperability testing in the fourth quarter of 2005, with full testing and qualification expected early in 2006. It is expected that multistream CableCARDs will be widely available for use in commercially-available devices by mid-2006 and will be supported by MSOs.

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If you have any questions about the information being submitted with this letter, please do not hesitate to contact me.

Respectfully submitted,

**/s/ Neal M. Goldberg**  
Neal M. Goldberg

cc: Natalie Roisman  
Andrew Long  
Julie M. Kearney  
Robert Schwartz

## Adelphia FCC CableCARD Report

The following information is required on a quarterly basis starting October 01, 2005 and every 3 months henceforth per the FCC *Second Report and Order* dated March 17, 2005.

Reporting Period: September 01 thru November 30 2005

1. General availability of CableCARDS

Motorola: 3476 available inventory  
SA: 3656 available inventory

2. The number of CableCARDS in service as of November 30, 2005

Motorola: 5158  
SA: 3173

a. How cards are placed in Service: Professional Install Only

3. Whether service calls are required for all CableCARD installations?

100% truck roll for installation

4. Average number of truck rolls to install a CableCARD:

Estimated at 1.13:1

5. Monthly price charged for a CableCARD: \$1.75

Average installation cost of a CableCARD:  
\$40; price may be waived, subject to marketing and sales incentives.

6. Problems encountered in deploying CableCARDS and how problems are resolved?

For the billing quarter September thru November 2005, calls tracked using Adelphia billing systems:

a. Total trouble calls with problem code related to CableCARD: 2113  
b. CableCARD T/Cs with problem codes related to installs: 576

Training aids, documentation and web tools are provided to local system personal to aid in resolving potential problems with CableCARDS. Issues which are not resolved at the local system level may be escalated to Adelphia's 24x7 Video Operations Group. This group maintains detailed CableCARD information, such as known issues lists, CE-supplied troubleshooting documentation and current software "s/w" releases in an effort

to provide local systems with the information they'll need to complete a CableCARD installation. The following examples represent typical issues that were escalated to this group during this reporting period. Some of these issues may have occurred multiple times:

**Platform:** Motorola **System:** Amelia  
**Issue:** Not showing any digital channels  
**Corrective Action Taken:** CSG Zport backed up, waited for billing hits to go through  
**Status:** Corrected issue

**Platform:** SA **System:** Auburn  
**Issue:** Cable Card is not receiving any of the off air HD channels  
**Corrective Action Taken:** Referred customer to DTV manufacturer for upgrade  
**Status:** Open

**Platform:** Motorola **System:** Augusta  
**Issue:** TV is not getting digital and HD plus channels  
**Corrective Action Taken:** Referred to dispatch to pair card  
**Status:** Corrected issue

**Platform:** SA **System:** Canton  
**Issue:** No digital channels  
**Corrective Action Taken:** Sent staging EMMs to card  
**Status:** Corrected issue

**Platform:** SA **System:** Canton  
**Issue:** CableCard P#1 invalid error  
**Corrective Action Taken:** Host information entered incorrectly  
**Status:** Corrected issue

**Platform:** SA **System:** Cleveland  
**Issue:** No digital channels  
**Corrective Action Taken:** Sent staging EMMs to card  
**Status:** Corrected issue

**Platform:** SA **System:** Cleveland  
**Issue:** No digital channels  
**Corrective Action Taken:** Correct packages were added to account  
**Status:** Corrected issue

**Platform:** SA **System:** Cleveland  
**Issue:** P# Invalid Error when pairing  
**Corrective Action Taken:** Host ID incorrect, Corrected Host ID  
**Status:** Corrected issue

**Platform:** SA    **System:** Cleveland

**Issue:** CC not receiving any of the subscription digital channels

**Corrective Action Taken:** De-paired card and had dispatcher send new pair command

**Status:** Corrected issue

**Platform:** Motorola    **System:** Colorado Springs

**Issue:** CableCard is not getting any HD channels

**Corrective Action Taken:** Reset host DTV

**Status:** Corrected issue

**Platform:** SA    **System:** Duryea

**Issue:** Could not receive all channels (analog and digital)

**Corrective Action Taken:** Reset host DTV

**Status:** Corrected issue

**Platform:** SA    **System:** Duryea

**Issue:** Cable Card is not authorized for services

**Corrective Action Taken:** Referred customer to DTV manufacturer

**Status:** Open

**Platform:** SA    **System:** Duryea

**Issue:** Cable Card is not downloading code

**Corrective Action Taken:** Swapped Cable Card

**Status:** Corrected issue

**Platform:** Motorola    **System:** Knoll Rd

**Issue:** Not receiving any encrypted digital channels

**Corrective Action Taken:** Had site add Cable Card to CSG and DAC

**Status:** Corrected issue

**Platform:** SA    **System:** Lackawanna

**Issue:** No Digital or Analog Channels

**Corrective Action Taken:** Referred to Host Manufacturer for upgrade

**Status:** Pending upgrade

**Platform:** SA    **System:** Lackawanna

**Issue:** SA CC not getting channels 119 & 126

**Corrective Action Taken:** Referred to Host Manufacturer for upgrade

**Status:** Pending upgrade

**Platform:** SA    **System:** Lackawanna

**Issue:** No pairing data

**Corrective Action Taken:** Replace cable card

**Status:** Corrected issue

**Platform:** SA    **System:** Lackawanna

**Issue:** No pairing data

**Corrective Action Taken:** Waited 5 minutes and pairing data came in, referred to dispatch to pair card.

**Status:** Closed

**Platform:** SA    **System:** Lackawanna

**Issue:** CC could not receive any digital encrypted channels

**Corrective Action Taken:** Reset host

**Status:** Closed

**Platform:** SA    **System:** Lackawanna

**Issue:** CC is not getting multiple digital or HD plus channels

**Corrective Action Taken:** De-paired and had dispatcher send new pair command

**Status:** Closed

**Platform:** SA    **System:** Londonderry

**Issue:** Cable Card is getting a 161-53

**Corrective Action Taken:** Referred to Host Manufacturer for Upgrade

**Status:** Pending upgrade

**Platform:** SA    **System:** Londonderry

**Issue:** Cable Card is getting a 161-1

**Corrective Action Taken:** Referred to Host Manufacturer for Upgrade

**Status:** Pending upgrade

**Platform:** SA    **System:** Morgantown

**Issue:** Cable Card is displaying a message to contact the manufacturer

**Corrective Action Taken:** Referred to Host Manufacturer for proper instructions to find pairing info

**Status:** Open

**Platform:** SA    **System:** Mt Airy

**Issue:** Host not showing pairing information

**Corrective Action Taken:** Recommended swapping cable card

**Status:** Open

**Platform:** Motorola    **System:** Ontario

**Issue:** Cable card error 202 when sent a billing hit

**Corrective Action Taken:** Replacing card

**Status:** Open

**Platform:** Motorola    **System:** Orange County

**Issue:** No channels found

**Corrective Action Taken:** Added card to DAC

**Status:** Corrected issue

**Platform:** SA    **System:** Plymouth  
**Issue:** Waiting on CP authorization  
**Corrective Action Taken:** Reset Host  
**Status:** Corrected issue

**Platform:** SA    **System:** Spotsylvania  
**Issue:** Not getting ESPN HD  
**Corrective Action Taken:** Referred to Host Manufacturer for upgrade  
**Status:** Corrected issue

**Platform:** Motorola    **System:** Staunton  
**Issue:** Cable Card is not getting the correct channel map and channels  
**Corrective Action Taken:** Sent init and Cold init from DAC  
**Status:** Corrected issue

**Platform:** SA    **System:** Staunton  
**Issue:** Cable Card is not receiving any encrypted digital channels  
**Corrective Action Taken:** Card was not paired, manually paired from DNCS  
**Status:** Corrected issue

**Platform:** SA    **System:** Utica  
**Issue:** No Pairing Data  
**Corrective Action Taken:** Referred to Host Manufacturer for Upgrade  
**Status:** Open

**Platform:** SA    **System:** Waterbury  
**Issue:** CableCard not receiving any analog or digital channels  
**Corrective Action Taken:** Customer upgrade to HD Converter  
**Status:** Closed

**Platform:** SA    **System:** Waterbury  
**Issue:** CableCard needed a HIT sent from the DNCS  
**Corrective Action Taken:** Sent staging EMMs to card from DNCS  
**Status:** Corrected issue

**Platform:** Motorola    **System:** Van Nuys  
**Issue:** Cable Card - Digital basic and premium channels are not working  
**Corrective Action Taken:** Sent init and Cold init from DAC  
**Status:** Corrected issue

**Platform:** Motorola    **System:** Van Nuys  
**Issue:** Cable Card is not getting ESPN HD  
**Corrective Action Taken:** Referred to Host Manufacturer for Upgrade  
**Status:** Open

**Platform:** Motorola **System:** Van Nuys  
**Issue:** CableCard not receiving any analog or digital channels  
**Corrective Action Taken:** Replacing Cable Card  
**Status:** Corrected issue

**Platform:** SA **System:** West Palm  
**Issue:** PKBBBHDXG is not showing encrypted channels  
**Corrective Action Taken:** Referred to Host Manufacturer for Upgrade  
**Status:** Open

**Platform:** SA **System:** West Palm  
**Issue:** Cable Card not getting Digital and HBO channels  
**Corrective Action Taken:** Reset host  
**Status:** Corrected issue

**Platform:** SA **System:** West Palm  
**Issue:** CableCard is not receiving any of the HD plus channels  
**Corrective Action Taken:** De-paired and had dispatcher send new pair command  
**Status:** Corrected issue

**Platform:** SA **System:** Westminster  
**Issue:** CableCard is not receiving any analog or digital channels  
**Corrective Action Taken:** Referred to Dispatch to add correct packages  
**Status:** Corrected issue

7). Process in place for resolving existing and newly discovered CableCARD implementation problems:

A). Adelphia will regularly provide updates to training aides and documentation which is posted to several web sites for access by local system personnel. Adelphia has also deployed a new Customer Care troubleshooting web tool; Logicall. This web tool provides work flow process tips to help resolve typical customer call issues and does include support for the CableCARD. This tool also provides on-line links for CableCARD training aids and documentation.

B). Adelphia also uses a centralized system for CableCard install troubleshooting and support. All installs with issues can be escalated to our 24x7 video operations group which tracks issues in a bug database system called TrackIt. When appropriate, CE contacts are used to escalate issues that can not be resolved internally. Adelphia has supported numerous on site visits from CE vendors to aid in troubleshooting issues with newer DTVs.

C). Specific cable card trouble codes and fix codes have been added to the billing systems.

**Cablevision  
FCC CableCARD Quarterly Report**

**Introduction:** CableCARD technology, which enables digital televisions to display encrypted programming, has been available to 100% of our 3 million customers since July 2004. The installation and service of CableCARDS are handled as a routine practice in the normal course of business. As with any technical issue with a service provided by the company, when a problem is experienced and a resolution is determined, the information goes into a common database. The response to Question 9 was obtained from that information.

**1. Current Number of CableCARD Subscribers:** 5,311 (as of November 30, 2005). A 36% increase in deployment from the September report.

**2. Number of CableCARDS in Inventory:** 3,885 / 2,023 NDS + 1,705 SA Powerkey

**3. How are CableCARDS deployed:** All CableCARDS are professionally installed

**4. Percentage of Installs:** 100% Truck Rolls

**5. Average Number of Truck Rolls to Install a CableCARD:** 1.1

**6. Monthly Lease rate for CableCARD:** \$1.25

**7. Average installation Cost (if applicable):** Professional install fee is \$34.95.

**8. Number of problems\* encountered with CableCARDS:** 885 installation and post-installation problems were encountered during the period of July 1, 2005 through November 30, 2005.

1. Host Related: 58%
2. CableCARD related: 32%
3. Network Related: 7%

\*Other (box hits, order entry): 3%

**9. Of the problems encountered, please list how they were resolved: (Ex. TV Firmware upgrade)**

1. Host DCR TV Problems:
  - o CableCARD does not bind with the host - Swap the CableCARD. (Unbind first CableCARD with Addressable Systems Department and install/bind another CableCARD). The installer will check the television menu guide for information on CableCARDSs and follow the instructions in the menu. If that does not work, the customer is asked to call the host television customer service number for advice on how to obtain this information on installing the card. In some instances, the customer needs to contact the host TV manufacturer for a patch/chip to be sent out for the specific host TV or professional visit by the manufacture's technician.

#### **New Host DCR TV Problems (12/05/05)**

- o Particular Host TV: Black video on the channels in the 669 frequency. Waiting final firmware release.
  - o Particular Host TV: Receiving error code 44 with NDS cable cards referred issue to NDS.
  - o Particular Host TV: Audio break up when card is bound.
  - o TV Manufacturer, two models: Channel map problems on one model receive only channel 12-78. Resolution firmware upgrade to version 1.2.8. A second model resolution pending.
  - o TV Manufacturer: Some 2005 models video and audio break up. Being investigated by the manufacturer.
2. One manufacturer's digital television sets require a separate cable input for the analog channels in order for the customer to view the analog signals.
  3. Network or Software Problems – SA or NDS will review trouble call tickets to determine if a software patch is required.
  4. Black Screen - If the NDS Smart card & sleeve info are not in the first and second outlets in Cable data move them to those positions and re-hit the smart card.

Cablevision has established technical support protocols to enable the technician to receive immediate troubleshooting support from Dispatch, Network Support or Engineering if the technician encounters a problem during the professional installation of CableCARD equipment. It should be noted that Cablevision responds to each CableCARD performance issue in the same manner we respond to other CE interoperability issues (e.g., DVI, HDMI or 1394 interoperability issues).

If the technician is unable to complete the installation due to technical issues, the technician is required to record the reason(s) why the install was not completed and the work order remains open. At the customer's request, a follow-up visit is conducted to further troubleshoot the problem and/or install a second (new) CableCARD. At this visit, additional personnel may accompany the technician to provide enhanced technical support. If a customer is unable to activate equipment due to interoperability issues, Cablevision will contact the CE manufacturer to define the issue, resolve the problem and once again offer the customer the CableCARD installation.

The data (fix codes) collected from the problem are analyzed by the operations and engineering departments to determine if there are systematic issues contributing to the CableCARD technology not functioning properly on the network.

Cablevision has also undertaken significant steps to pro-actively work with all the major CE manufacturers to identify the numerous CableCARD enabled devices and conduct interoperability testing in our (single) test laboratory before any problems have been experienced in the field.

**Charter Communications  
FCC CableCARD Reporting  
September 1, 2005 - November 30, 2005**

1. Current Number of CableCARD Subscribers as of November 30, 2005:  
The total number of Subscribers who have leased or purchased CableCARD devices through November 30, 2005 is 6474.
  
2. Provide the number of CableCARDS in inventory:  
SA CableCARD devices: 3742  
Moto CableCARD devices: 2918  
Total CableCARD devices: 6660
  
3. How are CableCARDS placed in service?  
Installations of a CableCARD requires a professional installation, including a truck roll, in all serviced areas with the exception of the North Carolina/Virginia market area, in which there is a self-installation process. Self installations account for .005% of all CableCARD installations during the reporting period.
  
4. Whether service calls are required for all CableCARD installations:  
Yes.
  
5. Average Number of Truck Rolls to Install a CableCARD:  
The average number of truck rolls to install a CableCARD (i.e., the initial truck roll and any truck rolls within 30 days from the date of installation) through November 30, 2005 was 1.3.
  
6. Monthly Lease rate for a CableCARD:  
The average monthly lease for a CableCARD device is \$1.50.
  
7. Average installation cost of a CableCARD (if applicable):  
The average cost for a professional installation is \$32.00.
  
8. Process for Resolving CableCARD trouble calls:

Customers with a CableCARD problem are directed to call the Charter customer service number. Customer Service Representatives (CSRs) are trained about the features and benefits of CableCARDS, just as they are trained on any other Charter product offering. Some CableCARD calls are forwarded to the Advanced Services Team, whose members have more training and expertise on troubleshooting such calls. If the problem cannot be resolved over the phone, the CSR places a service order, which is then fulfilled by the cable installers and technicians. Charter maintains a record of any service calls for which a technician is dispatched.

Should a local cable installer or technician encounter a CableCARD problem, he/she reports such problem to his/her supervisor and the local technical support group. If the problem is not resolved at the local level, it is then escalated to corporate engineering or billing. If there appears to be a host problem, Charter has a designated member of its engineering department contact and place a report with the consumer electronics vendors.

9. Reported problems associated with CableCARDS and how they were resolved:

As in the prior quarter, the majority of problems with CableCARD installation in the September 1 to November 30, 2005 quarter resulted from issues with the host television sets. Charter continues to troubleshoot and resolve problems occurring with various makes and models of DTV hosts, as well as network and CableCARD issues as they arise.

In certain areas Charter is experimenting with a system of testing CableCARDS at the system headend once a customer reports reception problems, avoiding a second truck roll if possible.

The problems and resolutions listed below are illustrative of the problems encountered at both the local and regional level, as well as those that were escalated to Charter's corporate offices. The DTV host manufacturer for each problem is identified by a letter only, to maintain confidentiality.

Illustrative Host Problems

- 1) Manufacturer: A  
Issue: Not Accepting CableCARD  
Resolution: Not resolved due to software issue  
Region: Southeast
  
- 2) Manufacturer: A  
Issue: Card not working  
Resolution: Customer instructed to call manufacturer for firmware upgrade  
Region: Southeast
  
- 3) Manufacturer: B  
Issue: Missing channels  
Resolution: Replaced line and reset, then referred to manufacturer  
Region: Southeast
  
- 4) Manufacturer: C  
Issue: TV would not read host or data numbers  
Resolution: Customer contacted manufacturer and is using DCT as an interim measure

- Region: West
- 5) Manufacturer: D  
Issue: Card not working  
Resolution: Customer instructed to call manufacturer for firmware upgrade  
Region: Southeast
- 6) Manufacturer: D  
Issue: Host not displaying all channels, including certain digital channels  
Resolution: Customer contacted TV manufacturer for firmware upgrade, which resolved the issue  
Region: West
- 7) Manufacturer: D  
Issue: Digital channels were lost  
Resolution: Following trouble shooting, technician called the manufacturer and performed a factory reset on the TV. Customer had changed a TV setting necessitating the reset.  
Region: Northeast
- 8) Manufacturer: E  
Issue: HBO could not be received  
Resolution: Customer directed to contact the TV manufacturer. Issue resolved with a host firmware upgrade.  
Region: Great Lakes
- 9) Manufacturer: E  
Issue: The host would only display analog channels. No POD ID or host ID would display. The menu read "no info available", but would display "cable card inserted" when card was installed.  
Resolution: Troubleshooting was completed without resolution. It was recommended that the customer contact the manufacturer.  
Region: Northeast
- 10) Manufacturer: E  
Issue: Service call to replace card  
Resolution: First card installation did not work. Following a firmware update to the plasma TV host, the new cable card was accepted.  
Region: Northeast
- 11) Manufacturer: F

Issue: After installing the card, it would work for several minutes before losing all digital channels. Re-hitting the card from DNCS would bring the channels back, but only temporarily. The technician attempted to install a second replacement card with no better results.  
Resolution: Customer requested digital box instead  
Region: Northeast

12) Manufacturer: G

Issue: Attempt to install a new cable card into DNCS. Some music choice channels were missing. Technician experienced multiple problems with the TV set not scanning any channels.  
Resolution: Customer directed to call the manufacturer for possible troubleshooting  
Region: Northeast

13) Manufacturer: H

Issue: TV incompatible with card. Losing digital channels, HD channels, and blocks of analog channels  
Resolution: n/a  
Region: Northeast

14) Manufacturer: H

Issue: Not updating TV guide  
Resolution: Reset and referred to manufacturer  
Region: Southeast

15) Manufacturer: H

Issue: Card not functioning  
Resolution: Problem with manufacturer. There are no firmware upgrades available. This is a known issue with this particular TV.  
Region: Great Lakes

16) Manufacturer: H

Issue: Card not working  
Resolution: Customer called manufacturer for firmware upgrade  
Region: Southeast

17) Manufacturer: I

Issue: Problem with channel map on TV  
Resolution: Used reset button on TV to correct the problem  
Region: West

- 18) Manufacturer: I  
 Issue: Channels missing  
 Resolution: Reset of TV set  
 Region: West
- 19) Manufacturer: J  
 Issue: Loss of digital channels and “signal cannot be decoded” message. Issue sometimes recurs even after CableCARD is reset.  
 Resolution: If re-setting the cable card does not work, customer instructed to call the manufacturer. Manufacturer will arrange a service call for the customer so that the loss does not happen again.  
 Region: Northeast
- 20) Manufacturer: J  
 Issue: Television displaying a code “161-6”  
 Resolution: After several hours of troubleshooting the customer was instructed to contact his dealer and see if the TV had software revision that was available for his model. The dealer had a technician come out and perform a Q-box firmware upgrade and the television worked fine with the CableCARD.  
 Region: Southeast
- 21) Manufacturer: J  
 Issue: Missing channels  
 Resolution: Referred to manufacturer  
 Region: Southeast
- 22) Manufacturer: J  
 Issue: Missing channels  
 Resolution: Replaced line, reset, referred to manufacturer  
 Region: Southeast
- 23) Manufacturer: J  
 Issue: Missing channels  
 Resolution: Replaced line, reset, referred to manufacturer  
 Region: Southeast
- 24) Manufacturer: J  
 Issue: The TV could not receive analog channels 48 through 50 and digital channels 770, 778, 815-822, 823-829, and 830  
 Resolution: Troubleshooting included trying a different card and updating firmware. Manufacturer also replaced tuner and

cable card reader, but TV still would not work correctly.  
Charter is still working with the manufacturer on this issue.  
Region: Great Lakes

25) Manufacturer: K  
Issue: TV not leaving channel 3  
Resolution: Reset TV  
Region: Southeast

26) Manufacturer: K  
Issue: Televisions with a software version below 1.2.8 will not show channels once the cable card is paired with our services  
Resolution: Solution is to call manufacturer customer support, confirm software version, and request a new one be sent to the customer. Once installed everything should work properly.  
Region: West

27) Manufacturer: n/a  
Issue: Losing digital channels, HD channels, blocks of analog channels  
Resolution: Firmware diagnostic conducted  
Region: Northeast

#### Illustrative CableCARD Problems

- 1) Manufacturer: J  
Issue: Customer could not install cable card  
Resolution: Installed cable card, added to account  
Region: West
- 2) Manufacturer: n/a  
Issue: Taking a long time for TV to acquire channels  
Resolution: Technician instructed to monitor the problem and swap the card if TV would not acquire channels  
Region: Northeast
- 3) Manufacturer: n/a  
Issue: Digital channels dropping off  
Resolution: Sent hit to card again and it worked  
Region: Southeast
- 4) Manufacturer: n/a  
Issue: Several nonfunctioning cards over three month period

Resolution: Cards were tested on a Charter set and did not work. The cards were sent back to the manufacturer.  
Region: Southeast

#### Illustrative Network Problems

- 1) Manufacturer: H  
Issue: Customer could not install CableCARD  
Resolution: Fixed billing issue and card worked  
Region: West
  
- 2) Manufacturer: D  
Issue: Missing channels  
Resolution: Replaced line, upped signal, reset  
Region: Southeast
  
- 3) Manufacturer: J  
Issue: Missing channels  
Resolution: Replaced line, upped signal, reset  
Region: Southeast
  
- 4) Manufacturer: n/a  
Issue: HD channels not authorizing  
Resolution: Increased signal at TV set and checked drop for trouble  
Region: Southeast
  
- 5) Manufacturer: n/a  
Issue: CableCARD would not work  
Resolution: Card worked after the drop was replaced  
Region: Great Lakes

**Comcast CableCARD Data (Quarterly Report)**  
**Sept - Oct - Nov 2005**

**Comcast Total**

**Current Number of CableCARD Subscribers** 41,296  
**Number of CableCARD in Inventory** 20,612

**How are CableCARDs deployed:**  
**Truck Roll / Self Install / Both** Both

**Total CableCARD Installs**  
Number of Installs - Truck Rolls 20,754  
Percentage of Installs - Truck Rolls 97%  
Number of Installs - Self Installs 644  
Percentage of Installs - Self Installs 3%

**Average Number of Truck Rolls to Install a CableCARD** 1.15

**Monthly Lease Rate for CableCARD** \$0.00

**Average Installation Cost (if applicable)** \$18.57

**Number of problems encountered with CableCARD (trouble call resolution categories)**  
Total Number of Problems 5,167  
Host Related 1,451  
CableCARD Related 1,704  
Network Related 2,012

**Illustrative problems encountered and how those problems were resolved**

A specific manufacturer's model of DCR set failed to receive broadcast channels and displayed error code "202". Error 202 means nothing to Comcast technicians. The issue was eventually escalated to the manufacturer for resolution and the manufacturer is still investigating.

A number of different manufacturer's DCR sets exhibited a variety of different issues in customer homes and after considerable troubleshooting the issues were escalated to the manufacturer who determined that a software upgrade to the set was needed. These issues continue to appear on a regular basis.

Comcast installers are often unaware of specific operational details with certain models of DCR sets resulting in excessive installation times, repeated troubleshooting trips to the home and calls to the manufacturer for assistance. In many cases the manufacturer representatives that answer the phone are unable to assist requiring Comcast to escalate to higher levels at the company for assistance.

A DCR set failed after initially working properly with a Comcast CableCARD. The customer assumed the problem was associated with the Comcast CableCARD but after troubleshooting with the manufacturer it was determined that the TV tuner had failed and needed to be replaced.

CableCARD installed with wrong host info in DST. Tech returns to customer house and unplugs cable card. Dispatch corrects info in DST and initializes the card.

A DCR set stopped receiving digital channels and the CableCARD was replaced.

Certain HD Broadcast Channels (NBC-HD/CBS-HD) failed to display properly with some DCR sets with SA CableCARDS. The intermittent issue was escalated to SA and identified to be a CableCARD related issue that SA was able to resolve.

The channel TNT-HD failed to display on some DCR sets. Comcast was unable to duplicate issue in a test environment on another DCR set. The problem unexpectedly disappeared and we are tracking to see if it re-appears.

**Process in place for resolving existing and newly discovered CableCARD implementation problems**

Comcast has a CableCARD problem escalation process that starts with the local installer/technician and escalates to local supervisory personnel, then to the Division office, and finally to corporate Engineering for further escalation to CableLabs or to senior contacts at the CE manufacturer as needed. The local market is expected to review CableCARD issues lists and troubleshooting information posted on an internal web site prior to escalation. If an issue with the CE Host device is suspected the local market personnel also make an initial contact to the CE manufacturer's standard support line for help prior to escalation.

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1. General availability of CableCARD:  
Total CableCARD devices available: 6275\*
  - a. Please provide an indication of supply availability for SA and Motorola CableCARDS  
SA CableCARD devices: 4076\*  
Moto CableCARD devices: 2199\*  
  
\*The above numbers only include inventory available in our billing system and inventory currently assigned to FSRs. It does not include inventory assigned to subscriber accounts, inventory pending disposition or repair, etc.
  
2. The number of Residential CableCARDS in service:  
Cox TOTAL: 9858  
Moto Total: 4441  
SA Total: 5417
  
3. How cards are placed in service  
A professional installation, requiring a truck roll, is currently required for all CableCARD device installs.
  
4. Whether service calls are required for all CableCARD installations?  
Yes.
  
5. Average number of truck rolls to install a CableCARD?  
The average number of truck rolls needed to install a CableCARD includes the initial truck roll for the install itself and any truck rolls required within 30 days of the install.  
  
The average number of truck rolls to install a CableCARD from September 1st, 2005 through November 30th, 2005 was 1.137  
  
The breakdown for each month is as follows:
  - September 2005: 1.148
  - October 2005: 1.156
  - November 2005: 1.109
  
6. Monthly price charged for a CableCARD?  
The average monthly rental for a CableCARD device is \$1.99
  
7. Average installation cost of a CableCARD if applicable?
  - a. What is the service charge to the subscriber for the installation?  
The average cost for a professional installation is \$ 20.49
  
8. Problems encountered in deploying CableCARDS and how problems are resolved?  
Total number of trouble calls for all CableCARD issues, escalated and un-escalated:
  - September 2005: 955
  - October 2005: 889
  - November 2005: 962

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Only the issues that were escalated to the Atlanta corporate offices are described below. Cox also uses a bi-weekly conference call to distribute information to the systems, such as issues lists and CE-supplied troubleshooting documentation, in an effort to provide the systems with the information they'll need to avoid escalation.

Host Problems

- Cleveland
  - Problem: TV only displaying analog channels. No digital video/audio.
  - Resolution: Cox troubleshooting completed with no resolution. Cox directed customer to contact the DCR manufacturer.
- Central Florida
  - Problem: TV not displaying HD video/audio
  - Resolution: Cox troubleshooting completed with no resolution. Cox referred customer to contact the DCR manufacturer.
- Gulf Coast
  - Problem: TV not displaying digital channels
  - Resolution: Open Issue. Cox troubleshooting completed with no resolution. Cox directed customer to contact the DCR manufacturer.
- Gulf Coast
  - Problem: Showtime HD not displaying on TV.
  - Resolution: Cox troubleshooting completed with no resolution. Cox directed customer to contact the DCR manufacturer. DCR Manufacturer suspects the cause to be interference from adjacent OOB frequency. This issue was corrected with a TV manufacturer firmware update.
- Gulf Coast
  - Problem: When tuning from an HD channel to Music Choice, and then back to the previous HD channel, the HD video and audio is gone.
  - Resolution: Cox troubleshooting completed with no resolution. Cox directed customer to contact the DCR manufacturer. Manufacturer's phone support mentioned that a tech may have to go out the home to investigate. Waiting for additional findings from manufacturer /site.
- Gulf Coast
  - Problem: TV only displays "CableCARD firmware upgrade in process" message, even though a firmware upgrade was not scheduled
  - Resolution: Cox troubleshooting completed with no resolution. Cox directed customer to contact the DCR manufacturer. Case opened with manufacturer; however, customer opted for a cable box instead of keeping the CableCARD.
- Gulf Coast
  - Problem: TV not displaying video/audio for any digital channels
  - Resolution: Possible known issue: Cox troubleshooting completed with no resolution. Cox directed customer to contact the DCR manufacturer.
- Gulf Coast
  - Problem: TV did not recognize that a CableCARD was inserted. Multiple cards attempted.
  - Resolution: Cox troubleshooting completed with no resolution. Cox directed customer to contact the DCR manufacturer.
- Gulf Coast
  - Problem: TV displays all authorized channels for first couple days, and then loses all encrypted channels.
  - Resolution: Cox troubleshooting completed with no resolution. Cox directed customer to contact the DCR manufacturer.

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- Las Vegas
  - Problem: TV only displaying 161-1 error
  - Resolution: TV had a bent pin. Customer was able to straiten pin, issue/error code went away. We are not sure how the pin was bent.
- Las Vegas
  - Problem: TV Periodically loses all digital channels
  - Resolution: Cox troubleshooting completed without resolution. Cox directed customer to contact the DCR manufacturer for a host firmware upgrade. Manufacturer identified issue and is now working on new firmware to correct the issue. Customer has been referred to work with manufacturer to receive the TV firmware once it is available.
- North Carolina
  - Problem: Only non-encrypted digital channels are displayed – no analog or encrypted.
  - Resolution: Open Issue: Cox troubleshooting completed with no resolution. Cox directed customer to contact the DCR manufacturer.
- North Carolina
  - Problem: Customer periodically loses video/audio to sporadic digital and analog channels.
  - Resolution: Known issue: Cox troubleshooting completed with no resolution. However, Power cycling the TV temporarily corrects. Cox directed customer to contact the DCR manufacturer for final resolution.
- Oklahoma City
  - Problem: Does not display any encrypted digital channels
  - Resolution: Cox troubleshooting completed with no resolution. Cox directed customer to contact the DCR manufacturer.
- Oklahoma City
  - Problem: TV displays error code 161-53 on all channels, then loses picture/audio after error
  - Resolution: Cox troubleshooting completed with no resolution. Cox directed customer to contact the DCR manufacturer. However the issue resolved itself. Core issue unknown.
- Phoenix
  - Problem: Picture comes in for split second, then goes out
  - Resolution: Cox troubleshooting completed with no resolution. Cox directed customer to contact the DCR manufacturer. Awaiting additional information.
- San Diego
  - Problem: TV not displaying (A/V) encrypted channels 343, 346, 347
  - Resolution: Open issue: Cox troubleshooting completed without resolution. Cox directed customer to contact the DCR manufacturer for a host firmware upgrade. TV is still not displaying channels 343, 346, 347. Manufacturer found that they are incorrectly assigning PIDs. Manufacturer is still working on a resolution. The customer also has a cable box installed until a fix is available.
- San Diego
  - Problem: TV loses digital channels after period of time.
  - Resolution: Known issue: Cox troubleshooting completed with no final resolution. Resetting the CableCARD from the TV menu corrects the issue temporarily. Cox directed customer to contact the DCR manufacturer.
- San Diego
  - Problem: TV will not display encrypted channels (A/V)
  - Resolution: Cox troubleshooting completed with no resolution. Cox directed customer to contact the DCR manufacturer.
- San Diego
  - Problem: TV will not display encrypted channels (A/V)

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- Resolution: Open Issue. Cox troubleshooting completed. Awaiting verification of CableCARD authorization from site. If the card is verified to be authorized (via diagnostic screens), the customer will be referred to the DCR manufacturer.
- San Diego
  - Problem: TV periodically displays error "Please call your cable provider" then displays a black screen with no audio.
  - Resolution: Cox troubleshooting completed with no resolution. Cox directed customer to contact the DCR manufacturer. Customer opted to use a cable box instead of CableCARD
- San Diego
  - Problem: TV periodically loses all digital channels except channels 2-8
  - Resolution: Known issue: Cox troubleshooting completed with no resolution. However, resetting CableCARD through TV menu temporally restores services. Cox directed customer to contact the DCR manufacturer.
- San Diego
  - Problem: Customer losing all digital channels. Tried two cards.
  - Resolution: Cox troubleshooting completed with no resolution. Cox directed customer to contact the DCR manufacturer.
- San Diego
  - Problem: Customer losing analog and digital channels.
  - Resolution: Known issue. Reset TV through TV menu, all channels came back, issue has not reappeared.
- Connecticut
  - Problem: Not tuning any premium channels except HBO
  - Resolution: Cox troubleshooting completed with no resolution. Cox directed customer to contact the DCR manufacturer. DCR manufacturer FW Upgrade solved the issue.
- Connecticut - **Multiple instances of this issue have occurred**
  - Problem: Not tuning random channels. No apparent pattern (not on the same multiplex, Copy Protection level, encryption equipment, QAM frequency, etc.)
  - Resolution: Cox troubleshooting completed with no resolution. Cox directed customer to contact the DCR manufacturer. Still waiting on the manufacturer as a FW Upgrade has solved similar DCR manufacturer issues in other Cox systems.
- Connecticut
  - Problem: Not tuning several channels in the digital basic channel map.
  - Resolution: Cox troubleshooting completed with no resolution. Cox directed customer to contact the DCR manufacturer. DCR manufacturer replaced the motherboard and upgraded the host Firmware. Issue resolved.
- Connecticut
  - Problem: TV not tuning encrypted channels with CCI enabled. Host and CBC properly paired, but employing CCI results in black screen.
  - Resolution: Cox troubleshooting completed with no resolution. Cox directed customer to contact the DCR manufacturer. System & customer is working with manufacturer on 12/08/2005 to capture MPEG stream for analysis in the manufacturer's Engineering dept.
- Hampton Roads
  - Problem: The CableCARD was not receiving the HBO, HBO HD, and the Expanded HD Tier. Received all other packages correctly.
  - Resolution: Cox troubleshooting completed with no resolution. Cox directed customer to contact the DCR manufacturer. Manufacturer upgraded FW and the issue was resolved.
- Hampton Roads - **Multiple instances of this issue have occurred. (8 instances were escalated)**
  - Problem: Set requires reset in order to re-acquire Channel map

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- Resolution: Known issue with this manufacturer. Cox troubleshooting completed with no resolution. Cox directed customer to contact the DCR manufacturer, as requested by manufacturer.
- Hampton Roads
  - Problem: CableCARD not receiving any digital channels (encrypted or unencrypted). DCR manufacturer replaced reader, however, the DCR TV still wouldn't tune. Cox Tech verified receiving channel map, DSP, OOB, Authorization.
  - Resolution: Cox troubleshooting completed with no resolution. Cox directed customer to contact the DCR manufacturer. Manufacturer upgraded the DCR TV firmware and the issue was resolved
- Hampton Roads
  - Problem: Error code 161-4 displayed and DCR TV lost all HD channel authorization
  - Resolution: Cox troubleshooting completed with no resolution. Cox directed customer to contact the DCR manufacturer for FW upgrade. Awaiting completion of upgrade to roll additional truck to finalize install.
- Middle America
  - Problem: Tech could not get CableCARD to pair. Two CableCARDS attempted.
  - Resolution: Cox troubleshooting completed with no resolution. Cox directed customer to contact the DCR manufacturer. Manufacturer FW upgrade resolved the issue.
- Oklahoma (Greater)
  - Problem: TV randomly loses authorization. No relation to CCI, Encryption status or content (HD or non-HD). There have been 10 truck rolls to this account.
  - Resolution: Open Issue: Cox troubleshooting completed with no resolution. Cox directed customer to contact the DCR manufacturer. System is working with manufacturer on 12/08/2005 to capture MPEG stream for further analysis.
- Omaha – **Multiple instances of this issue have occurred**
  - Problem: Set requires reset in order to re-acquire Channel map
  - Resolution: Known issue. Cox troubleshooting completed with no resolution. Cox directed customer to contact the DCR manufacturer as requested by manufacturer.
- Omaha
  - Problem: Television not able to tune analog channels.
  - Resolution: Cox troubleshooting completed with no resolution. Cox directed customer to contact the DCR manufacturer. The manufacturer swapped tuners. New tuner worked, but the TV lost analog within 8 hours. The manufacturer then swapped out the motherboard and upgraded FW, resolving the issue.
- Omaha
  - Problem: Television not able to tune analog channels.
  - Resolution: Cox troubleshooting completed with no resolution. Cox directed customer to contact the DCR manufacturer. Awaiting firmware upgrade from manufacturer.
- Omaha
  - Problem: Television loses channels once CableCARD is installed. Not receiving authorization messages.
  - Resolution: Cox troubleshooting completed with no resolution. Cox directed customer to contact the DCR manufacturer. FW upgrade from manufacturer resolved the issue.
- Omaha
  - Problem: Not receiving digital or HD channels. Signal Cannot Be Decoded error message. Three different CableCARDS all resulted with the same error.
  - Resolution: Cox troubleshooting completed with no resolution. Cox directed customer to contact the DCR manufacturer for FW Upgrade. Based on past experience, it is suspected to be a bad tuner and/or FW.
- Omaha

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- Problem: Certain channels wouldn't tune, even after verifying connectivity and packages. Doesn't appear to be specific to packages, encryption status, content (HD or non-HD), etc.
- Resolution: Cox troubleshooting completed with no resolution. The issue resolved itself when channels successfully tuned after several days.
- West Texas –**Multiple instances of this issue have occurred**
  - Problem: Set requires reset in order to re-acquire Channel map
  - Resolution: Known issue. Cox troubleshooting completed with no resolution. Cox directed customer to contact the DCR manufacturer, as requested by the manufacturer.

CableCARD Problems

- Hampton Roads
  - Problem: DCR TV tunes to channel two, but then freezes when attempting to tune to any other channel.
  - Resolution: CableCARD was replaced. Issue resolved.
- Central Florida - **Multiple instances of this issue have occurred**
  - Problem: TV not displaying digital video/audio
  - Resolution: Upgraded CableCARD firmware
- Central Florida
  - Problem: TV not displaying any digital video/audio, only displaying off-air HD
  - Resolution: Upgraded CableCARD firmware

Network Problems

- Gulf Coast
  - Problem: CableCARD did not display MMI screen
  - Resolution: Cox troubleshooting completed with resolution. Corrected poor signal quality in the home. Issue resolved.
- Gulf Coast
  - Problem: CableCARD did not receive service authorizations
  - Resolution: Cox troubleshooting completed with resolution. Corrected issues with customers account in billing. Issue resolved.
- Rhode Island
  - Problem: CableCARD authorizations intermittent on a Cox owned TV set.
  - Resolution: Cox troubleshooting completed with resolution. Host ID Incorrectly input in ICOMS. Fixing data resolved the issue.

9. Process in place for resolving existing and newly discovered CableCARD implementation problems
- a. Please describe any internal business process you have in place to report/track/resolve problems prior to escalation to the weekly call or joint call with CE.

For any CableCARD issues encountered by a subscriber, Cox follows the attached troubleshooting process. If the troubleshooting resolves the issue, no further action is taken. If the troubleshooting procedures do not correct the issue, the issue is escalated to one or more of the following personnel within the system: (i) the Digital test desk; (ii) the IT group, and/or; (iii) the system's DAC or DNCS administrator. If none of the foregoing is able to resolve the issue, a problem form is completed and sent to corporate engineering. The problem form collects specific details about the problem and alerts the engineering team to the relevant issues. Corporate engineering then follows up on the issue, contacting all of the necessary parties (including the CE manufacturers) until the issue is resolved.

In addition, a representative from each Cox system attends a bi-weekly conference call to discuss relevant CableCARD issues that have not yet been escalated, significant trends in the installation and maintenance of CableCARDs, and customer concerns within the system. Cox also uses this conference call to distribute important information to the systems, such as CE-supplied troubleshooting procedures or installation documentation. Atlanta operations

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and Engineering personnel are usually engaged on the call and work with the systems to resolve any issues or concerns.

In addition, Cox maintains an intranet site containing general information about CableCARDS and specific issue updates. Cox Customer Support, Field Service, and Field Service Support also may use this site to review troubleshooting guidelines or details from CE manufacturers.

The DAC and DNCS administrators in each system also have direct connections with ATL operations and engineering to escalate any issues that require immediate assistance.

## Time Warner Cable FCC CableCARD™ Status Report

*Current number of CableCARDs customers: 13,074*

*Number of CableCARDs available in inventory: 8,611*

*How are CableCARDs deployed? Majority of TWC divisions require a service appointment.*

*Percentage of installs: Service Appointment: 82%; Self Install: 18%*

*Average number of truck rolls required to install a CableCARD: 1.5*

*Monthly lease rate for CableCARD: \$1.75*

*Do you charge for CableCARD installs? Yes - 16 divisions, No - 11 Divisions*

*What is the average installation cost? \$18.95*

*What is your process in resolving existing and newly discovered CableCARD implementation problems?*

**The process reported in our previous submission is still in place. The web forum referred to as “eRoom” is still in use for resolving existing and newly discovered CableCARD implementation problems. The eRoom also allows TWC divisions to share information on issues and work together to resolve them.**

*Problems encountered with CableCARDs and their resolution*

**Our divisions continue to report a variety of different issues arising with respect to CableCARD host device installations.**

**Problem:** Incorrect software on host device. This continues to cause the most reported issues to date.

**Resolution:** The customer must contact the CE manufacturer to request a software patch to upgrade the TV. A follow-up service appointment is needed after the CE manufacturer has upgraded their host device.

**Problem:** Low RF levels at host device caused by faulty connectors, old splitters, power strip with RF surge protector or wrong splitter configuration

**Resolution:** Repair, replace or reconfigure customer’s in-home wiring

**Problem:** No audio on two digital channels  
**Resolution:** Division discovered that they were receiving MPEG audio from two programmers rather than Dolby AC-3 (which is supported by UDCPs). Division reprogrammed their satellite receivers for AC-3 and problem was resolved

**Problem:** No digital channels on Host device other than local broadcast networks  
**Resolution:** Customer had selected incorrect cable provider from TV Guide menu. Once the correct selection was made, all digital channels were received

**Problem:** Customer seeing "CableCARD Inserted" screen after powering down and powering up his TV  
**Resolution:** After contacting CE manufacturer, it was discovered this is normal operation for the TV.

**Problem:** Incorrect Host and CableCARD ID entered in billing system  
**Resolution:** A follow-up call to customer to confirm correct IDs

**Problem:** Host device unable to receive programming due to confusion with multiple input connectors on UDCP TV  
**Resolution:** Cable moved to correct input

**Problem:** Certain Host devices requiring dual inputs (analog and digital)  
**Resolution:** RF splitter required at input to Host device

**Problem:** Host TVs failing to display encrypted services after a set period of time  
**Resolution:** Customer unplugs or resets Host device