

**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
	)	

**REPLY COMMENTS OF NVIDIA IN  
SUPPORT OF THE COMMENTS OF THE COMPUTER COMPANIES**

NVIDIA Corporation (“NVIDIA”) hereby files these reply comments to express its full support for the Comments of the Computer Companies in the above-captioned proceeding.<sup>1</sup>

Like the Computer Companies, NVIDIA has grave concerns about the Downloadable Security Report and the accompanying Downloadable Conditional Access System Host License Agreement (the “DCAS Agreement”) filed by NCTA. Through the DCAS Agreement, the cable industry appears to be attempting to assert control over the internal architecture of personal computers – in this case by effectively outlawing the use of the PCI Express interconnect in conjunction with cable-compatible digital television products.<sup>2</sup> If the Commission approves these tactics, it will be permitting the cable industry to effectively exclude the personal computer

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<sup>1</sup> NVIDIA Corporation is the worldwide leader in programmable graphics processor technologies. The Company creates innovative, industry-changing products for computing, consumer electronics, and mobile devices. NVIDIA is headquartered in Santa Clara, CA and has offices throughout Asia, Europe, and the Americas. Additional information regarding NVIDIA is available at [www.nvidia.com](http://www.nvidia.com).

<sup>2</sup> The Comments of the Computer Companies fully explain how the provisions of the DCAS Agreement would work to preclude the use of the PCI Express interconnect. Comments of the Computer Companies at 7-9.

industry from participating in the proposed DCAS system, and, ultimately, from the market for cable-compatible digital television products.

As a designer and manufacturer of graphics processing hardware components for use in personal computers, NVIDIA is acutely aware of this danger. By restricting personal computer and component manufacturers from using robust interconnects like PCI Express to link components within personal computers, the DCAS Agreement makes it all but impossible for companies like NVIDIA to comply with the terms of the DCAS Agreement.<sup>3</sup> At the very least, such restrictions threaten to make compliance exponentially more expensive without providing content owners or the cable industry with any corresponding benefits in terms of additional security. The end result will be that consumers who wish to purchase computing equipment with integrated video capability will be forced to pay exorbitant prices for less flexible equipment that lacks the functionality they are used to employing with traditional non-integrated devices like televisions and DVD players. This cannot be the result the Commission was intending to encourage when it asked the cable industry to report on the feasibility of downloadable security.

For these and the additional reasons stated in the Comments of the Computer Companies, the DCAS Report and Agreement provide the Commission with no basis for further extending the date by which cable operators are required to separate the security functions from set-top boxes, and the Commission should refuse to do so. Because downloadable security is an idea that shows great promise, however, NVIDIA also agrees that the Commission should consider -- and permit interested parties the opportunity to comment upon -- future cable industry submission that provide (1) additional licensing information needed by companies like NVIDIA

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<sup>3</sup> NVIDIA strongly endorses Appendix A to the Comments of the Computer Companies, which fully demonstrates the highly robust nature of the PCI Express Interconnect.

before they can sign agreements like the DCAS Agreement; and (2) a downloadable security regime that will actually ensure a fair and competitive market for digital television devices.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Ned Finkle', written over a horizontal line.

Ned Finkle  
VP of Strategic Marketing

2-2-06

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