

**Seth D. Greenstein**  
Attorney at Law  
202-204-3514  
sgreenstein@constantinecannon.com

March 17, 2006

**VIA ELECTRONIC FILING**

Ms. Marlene Dortch, Secretary  
Federal Communications Commission  
445 12th Street, SW  
Washington, D.C. 20554

Re: Notice of Ex Parte Presentation, CS Docket No. 97-80, PP Docket No. 00-67

Dear Ms. Dortch:

On March 16, 2006, James Morgan (for Sony Electronics, Inc.), Scott Blake Harris (counsel for Dell Inc.), and Jeffrey Lawrence and undersigned counsel (for Intel Corporation) met with:

- a) Jordan Goldstein, Office of Commissioner Michael Copps;<sup>1</sup> and,
- b) Heather Dixon, Office of Chairman Kevin Martin.<sup>2</sup>

The purpose of the meetings was to discuss the subjects addressed in the January 20, 2006 Comments submitted by Dell, Inc., Hewlett-Packard Company, Sony Electronics, Inc., and Intel Corporation; and by ATI Technologies, Inc., Dell Inc., Hewlett-Packard Company, and Intel Corporation. The representatives of these computer industry companies expressed the views described below.

One goal of the "Plug and Play" requirements is to enable **Consumer Choice** among devices at retail that can receive cable service. This choice should be independent of form factor, such that traditional set top boxes, televisions, and personal computers all should compete fairly and openly as the home gateway device that receives cable service.

Another goal is to promote **Consumer Control** over the content received from cable systems, so that high value audiovisual content can be shared freely on a true broadband home network among devices purchased by the consumer in an open

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<sup>1</sup> Mr. Lawrence did not participate in the meeting with Mr. Goldstein.

<sup>2</sup> Mr. Greenstein did not participate in the meeting with Ms. Dixon.

Ms. Marlene Dortch  
March 17, 2006  
Page 2

market. This can best be enabled where content is handed off to approved digital output protection technologies independent of the cable conditional access security system. Therefore, a system of rapid and fair approvals for digital output and recording protection technologies is essential to the future of consumer home networking.

The third goal, **Common Reliance**, facilitates fair competition by ensuring that cable system operators also must support the same separable conditional access regimes (such as CableCard) as for unidirectional and bidirectional digital cable products offered by manufacturers under the OpenCable technology license agreements. The computer industry representatives emphasized that the Commission should not grant any further extension of the July 1, 2007, common reliance date.

The representatives also expressed their view that the Downloadable Conditional Access Security (DCAS) proposal by the cable industry is not a true downloadable software solution, and is not readily implementable on a multifunction personal computing platform. True downloadable secure software solutions are available and in use on conditional access video systems in other countries; inexpensive to implement; readily renewable; and most amenable to implementation across the widest variety of consumer electronics and information technology platforms. Thus, a true downloadable software security system should be required so as to enable a more level competitive field among platforms and manufacturers.

Respectfully submitted,

/s/

Seth D. Greenstein

cc: Heather Dixon  
Jordan Goldstein