



Consumer Electronics Association

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March 23, 2006

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

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

On March 22, 2006, Paul Thomsen of Hitachi Home Electronics and Seth Greenstein (counsel to Hitachi), David Kline of JVC America, John Taylor of LG Electronics, Martin Freeman of Philips, Craig Tanner of Sharp Corporation, Scott Szabo and Jim Morgan of Sony Electronics, David Starling and Mark Blevins of Toshiba America Consumer Products, and Michael Christian of TTE Technology, Inc., accompanied by Brian Markwalter and the undersigned counsel on behalf of the Consumer Electronics Association, met with William Johnson, Natalie Roisman, John Wong, Michael Lance, Steven Broeckaert, and Alison Greenwald of the Media Bureau, and Alan Stillwell of the Office of Engineering And Technology.

At the meeting these CEA member manufacturer representatives described examples from among the numerous circumstances in which television manufacturers have been required at great time and expense, including on-site visits, to identify, diagnose and initiate resolution of consumer problems with Digital Cable Ready TV receivers caused solely by errors or omissions attributable either solely or primarily to the systems employed by cable MSOs and/or their CableCARD vendors. As is disclosed by the attached copies of material, displayed to the FCC personnel as time permitted, in many cases the negative consumer experiences have been traced entirely to local MSO authorization and billing procedures that had not been configured properly for support of CableCARD-reliant devices. Such problems have been aggravated by insufficient training of local operator service personnel in troubleshooting, installation and service, and the unavailability of working and tested CableCARDS.

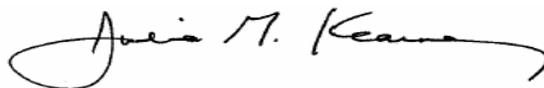
As reported, additional problems have been traced to non-stable firmware used by MSOs' vendors, and non-standard implementations by, and out-of-specification signals from, the cable plant. The representatives further objected to local MSO efforts to actively discourage consumers from using or relying on CableCARDS; the use of (out of date) lists to deny CableCARDS to users of Digital Cable Ready products in violation of regulations guaranteeing to consumers a "right to attach" products so labeled to MSO systems, the incorrect disparagement of particular brands or models, and other steps taken to discourage consumers from seeking or using CableCARDS.

The manufacturer participants shared the strong view that the above-referenced problems and numerous others would not have occurred with such frequency and severity had Commission regulations already implemented common reliance by cable system operators, in their own leased devices, on the CableCARDS and support systems on which Digital Cable Ready devices must rely. The manufacturer representatives asserted that under a common reliance regime, local MSOs would exercise greater care to avoid technical incompatibilities, and greater diligence in diagnosing and resolving problems of their own origin, rather than requiring intervention from television manufacturers seeking to protect customer relationships and brand reputations.

The attachments to this submission contain summaries of several examples of types of problems brought to the attention of the television manufacturer by consumers where, as described above, the issue could and should have been resolved solely by the local MSO. Also attached is an example of efforts undertaken by a cable MSO to actively discourage consumers from using CableCards.

This letter is submitted pursuant to Section 1.1206(b)(2) of the Commission's rules to provide notice of an oral ex-parte presentation in the above referenced matter. Copies of the letter and the attachments are being sent by electronic mail to the meeting participants identified above.

Respectfully submitted,



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