



September 29, 2006

VIA ECFS

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

**Re: Notice of Ex Parte Presentation, MB Docket No. 05-312 and CS Docket No. 97-80, CSR-7012-Z, CSR-7042-Z, and CSR-7049-Z**

Dear Ms. Dortch:

On September 28, 2006, Dr. Noh-Byung Park (Executive Vice President, Samsung Electronics Co., Ltd.), Ms. Ji-Seon Park (Senior Manager, Samsung Electronics Co., Ltd.), and the undersigned (Mr. John Godfrey, Vice President, Samsung Information Systems America, Inc.) met with Commissioner Deborah Taylor Tate and her legal adviser, Mr. Chris Robbins; Mr. Rudy Brioché (legal adviser to Commissioner Jonathan Adelstein); and Ms. Cristina Chou Pauzé (legal adviser to Commissioner Robert McDowell). In addition, the undersigned met with Ms. Heather Dixon and Ms. Krista Witanowski (legal advisers to Chairman Kevin Martin). In all of these meetings, Samsung discussed issues related to digital television broadcasting and digital cable.

Regarding digital television broadcasting, Samsung described a new technology the company is now developing, known as Advanced Vestigial Sideband ("A-VSB"). A-VSB is an enhancement to the Advanced Television Systems Committee ("ATSC") standard used in U.S. digital television broadcasting. A-VSB is now under study in the ATSC standards development process. When using A-VSB, a broadcaster will add certain tracking information to the transmitted signal so new receivers incorporating A-VSB technology can gain improvements in over-the-air reception, especially in conditions of dynamic multi-path interference such as may be caused by reflections from moving objects in the vicinity of the receiver. The A-VSB information is inserted in such a way that today's ATSC receivers (including televisions and converter boxes) will ignore the added information and will not be affected by it. In other words, A-VSB will be backward compatible with today's digital receivers.

If the broadcaster chooses to use the A-VSB "turbo stream" feature, in which a part of the broadcast signal is digitally encoded for further enhancement in its receivability (again, in a way that is backward compatible with today's receivers), Samsung's testing to date indicates that reception will be possible even if the receiver is moving at highway speeds. Combined with other enhancements and related technologies, this could enable broadcasters to provide new mobile digital television services using

their existing frequency spectrum. Samsung hopes this will enhance the value of over-the-air broadcasting and bring new benefits to U.S. consumers.

Samsung did not advocate any specific rule changes for broadcasters to be able to use A-VSB. However, Samsung noted that A-VSB offers a means of facilitating the coordination of multiple transmitters and urged the Commission to continue and complete its work on the currently open Distributed Transmission Systems rulemaking,<sup>1</sup> which would permit broadcasters to deploy multiple, coordinated transmitters and thereby provide more uniform signal strength throughout their service area.

Regarding digital cable, Samsung described its strong commitment to work with cable operators and CableLabs to develop and deploy new technologies for compatibility between consumer equipment and digital cable systems. In particular, Samsung is working with the cable industry, as well as other electronics companies, to develop the OpenCable Application Platform (“OCAP”).<sup>2</sup> OCAP will enable a cable system’s interactive services (*e.g.*, interactive program guide, video on demand, pay-per-view programming) to work with OCAP-equipped navigation devices (*e.g.*, set top boxes, televisions), despite the wide variation among cable head ends and cable-ready navigation devices. OCAP is designed to act as a standard software interface (or more precisely, a set of interfaces) between head ends and navigation devices, making it possible for them to communicate with each other. Without such a standard software interface, any navigation device must incorporate software specifically designed to interoperate with the cable system where it is used. Cable systems differ widely, and it is impracticable for a cable-ready device to incorporate all of the diverse software used across cable systems nationwide. OCAP offers the capability to bridge this divide in a uniform manner, so a cable-ready device that a consumer purchases could still be used if the consumer moved to a different cable system.

After OCAP is deployed nationwide, and with continued development of the technology’s interoperability and reliability, OCAP can provide the foundation for compatibility between cable systems and retail interactive digital cable ready (“IDCR”) devices provided by consumer electronics manufacturers. In these meetings, Samsung urged the Commission to expedite the completion of the regulatory framework for IDCR compatibility, including nationwide deadlines for deployment of a standard version of OCAP. Because OCAP continues to improve and to have vital capabilities added to it (such as secure interfaces to home networking and recording standards), Samsung did not recommend a specific version of OCAP, but noted that some specified, common version of OCAP will be necessary for nationwide compatibility.

Samsung also described its continuing technical collaboration with the cable industry on CableCARD removable security-card technology for conditional access to cable services, as well as a future successor to CableCARD relying upon software

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<sup>1</sup> MB Docket No. 05-312.

<sup>2</sup> For a complete description of OCAP, see <http://www.opencable.com/ocap>.

download from the cable head end, known as Downloadable Conditional Access Security (“DCAS”). Samsung noted that although DCAS promises greater flexibility and efficiency than CableCARD, and Samsung and others are working hard on its development, it is not yet completed and ready to be deployed.

The Commission’s current rules require cable operators to implement separated security functions for the equipment they procure for deployment to subscribers, and to stop acquiring such equipment that uses integrated security, as of July 1, 2007. Samsung stated that a substantial portion of cable operators’ set top boxes should rely on CableCARD, the same technology that retail digital cable ready devices use, which will do much to ensure the smooth and reliable operation of cable-ready products. Therefore, Samsung opposes the requests by Verizon Communications Inc. and the National Cable & Telecommunications Association for waivers from the integrated security prohibition, 47 C.F.R. § 76.1204(a)(1).<sup>3</sup>

However, Samsung also stated that it is not necessary for 100 percent of cable operators’ new set top box purchases to use CableCARD in order to gain the benefits of the integrated security prohibition. In addition, Samsung noted there is significant value for consumers in facilitating cable systems’ transition to all-digital operation, which will reclaim bandwidth on cable systems that is currently devoted to analog channels for more efficient and higher quality digital transmissions. The continued availability of minimal-cost, limited functionality digital cable set top boxes, without the cost of CableCARD, will assist cable operators in converting to all-digital operation. Therefore, Samsung supports the requests by Comcast Corporation and Charter Communications Inc. for limited waivers from the integrated security prohibition.<sup>4</sup>

This letter is being provided to your office in accordance with Section 1.1206 of the Commission’s rules. A copy of this letter is being delivered by e-mail to the parties listed below.

Please direct any questions regarding this notice to the undersigned.

Respectfully submitted,

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<sup>3</sup> The Verizon request is noticed for public comment as CSR-7042-Z in Docket No. 97-80. The NCTA request dated August 16, 2006, filed in Docket No. 97-80, has not yet been noticed for public comment.

<sup>4</sup> CSR-7012-Z (Comcast) and CSR-7049-Z (Charter), filed in Docket No. 97-80.

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cc:

Commissioner Deborah Taylor Tate  
Heather Dixon  
Krista Witanowski  
Rudy Brioché  
Chris Robbins  
Cristina Chou Pauzé