

COVINGTON & BURLING

1201 PENNSYLVANIA AVENUE NW
WASHINGTON, DC 20004-2401
TEL 202.662.6000
FAX 202.662.6291
WWW.COV.COM

WASHINGTON
NEW YORK
SAN FRANCISCO
LONDON
BRUSSELS

GERARD J. WALDRON
TEL 202.662.5360
FAX 202.778.5360
GWALDRON@COV.COM

October 17, 2006

Via Electronic Filing

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

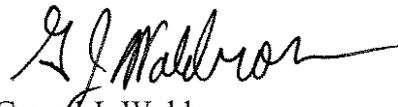
Re: Ex Parte: In the Matter of Comcast Corporation's Request for Waiver
of 47 C.F.R. § 76/1204(a)(1), CSR-7012-Z, CS Docket No. 97-80

Dear Ms. Dortch:

This letter is to report that on Monday, October 16, Paula Boyd, Regulatory Counsel of Microsoft Corporation and the undersigned met with Jessica Rosenworcel, Legal Advisor to Commissioner Copps, regarding pending waivers for set top box requirements. We expressed support for Comcast's waiver to the extent that the Commission ensures that third parties can make retail devices with functionality similar to that being deployed in the Comcast set top boxes covered by the waivers. In addition, the parties discussed the complexity and potential advantage of a comprehensive resolution to interrelated cable technology issues such as the integration ban, switched digital, and OCAP facing the consumer electronics, IT and cable industries.

Please address any questions to the undersigned.

Sincerely,



Gerard J. Waldron
Counsel to Microsoft Corporation

cc: Ms. Jessica Rosenworcel