



Sony Electronics Inc.

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October 30, 2006

EX PARTE, VIA ECFS

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

**Re: CS Docket No. 97-80
Commercial Availability of Navigation Devices**

Dear Ms. Dortch:

On October 27, 2006, Joel Wiginton, Vice President and Senior Counsel, Government and Industry Affairs, and Jim Morgan, Director and Counsel, Government and Industry Affairs, of Sony Electronics Inc. ("Sony"), and Natalie Roisman of Akin Gump Strauss Hauer & Feld LLP, counsel to Sony, met with Andrew Long, Mary Beth Murphy, Steven Broeckaert, Brendan Murray, and Alison Greenwald of the Federal Communications Commission ("Commission") Media Bureau.

The purpose of the meeting was to provide preliminary information regarding a comprehensive proposal for bi-directional digital cable products that Sony intends to file with the Commission. Specifically, Sony intends to propose that consumer electronics ("CE") manufacturers be permitted to offer retail products that give consumers access to basic interactive services, such as video-on-demand and pay-per-view programming, but which would not be required to include CableLabs' OpenCable Applications Platform ("OCAP") middleware. This approach would build on today's CableCARD specification, and could easily be adapted to a software-based conditional access solution. In addition, the proposal would require that retail devices have access to the navigation data or metadata provided in conjunction with the audio/visual content.

Under Sony's proposal, CE manufacturers would have the option of including OCAP in products designed to access basic interactive services, but would be required to include OCAP in retail devices that allow access to more advanced interactive features. In order to ensure that any OCAP-based products are consumer-friendly and commercially viable, Sony intends to request that the Commission mandate certain changes to OCAP and the CableCARD Host Interface License Agreement ("CHILA"). In addition, Sony intends to propose, among other things, that all cable systems deploy a single, fixed version of OCAP by a date certain and that leased cable devices use this same fixed version of OCAP.

Marlene H. Dortch

October 30, 2006

Page 2

This letter is provided pursuant to Section 1.1206 of the Commission's rules. A copy of this letter has been delivered by e-mail to the parties listed below. Please direct any questions regarding this notice to the undersigned.

Respectfully submitted,

/s/ Jim Morgan

Jim Morgan
Director and Counsel
Government and Industry Affairs
Sony Electronics Inc.

cc: (via electronic mail)

Andrew Long

Mary Beth Murphy

Steven Broeckaert

Brendan Murray

Alison Greenwald