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October 31, 2006

VIA ECFS

Ms. Marlene Dortch
Secretary
Federal Communications Commission
455 12th Street, SW
Washington, D.C. 20554

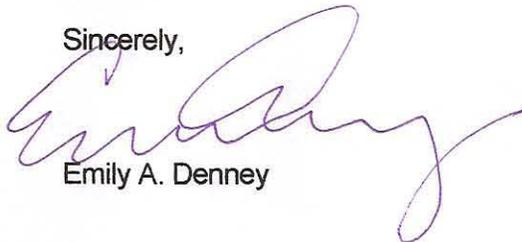
RE: Ex Parte Letter filed by Armstrong Utilities, Inc.; In the Matter of Comcast Corporation's Request for Waiver of 47 CFR 76.1204(a)(1); CS Docket No. 97-80; CSR-7012-Z

Dear Ms. Dortch:

Under 47 CFR § 1.1206(b), we electronically provide a copy of an ex parte letter delivered on October 30, 2006 from Jeffrey Ross, President of Armstrong Utilities, Inc. and member of the American Cable Association to Ms. Heather Dixon, legal advisor to Chairman Kevin J. Martin, regarding the low cost DCT-700 set-top box.

If we can provide additional information, please call.

Sincerely,



Emily A. Denney

cc via email:

James Casserly (jcasserly@willkie.com)
Christopher Cinnamon (cccinnamon@cm-chi.com)
Heather Dixon (heather.dixon@fcc.gov)
Donna Gregg (donna.gregg@fcc.gov)
Matthew M. Polka (mpolka@americancable.org)
Natalie Roisman (Natalie.Roisman@fcc.gov)
Jeffrey Ross (jross@AGOC.com)



ARMSTRONG®

VIA EMAIL: heather.dixon@fcc.gov

October 30, 2006

Ms. Heather Dixon
Legal Advisor to Honorable
Kevin J. Martin, Chairman
Federal Communications Commission
445 12th Street, S.W., Room 8-B201
Washington, D.C. 20554

Re: Armstrong Utilities, Inc.; CS Docket No. 97-80; CSR-7012-Z

Dear Ms. Dixon:

I write to supplement the information I provided you during our August 30 meeting and in my letter following that meeting. This information underscores how our customers will be hurt if the Commission does not grant a CableCARD waiver for the DCT-700. Moreover, we now know that time is of the essence. Motorola has informed us that they will not accept orders for the DCT-700 after November 15, 2006.

At the time of our meeting on August 30, 2006, we had just launched Television Plus, our all-digital service provided via the DCT-700. As I explained, the service includes in digital format all of our analog basic and expanded basic channels, an interactive programming guide, robust parental controls, and access to VOD and pay-per-view. Due to the limited functionality of the DCT-700, Television Plus does not include HD channels, a broadband connection and other features of our more advanced set-tops. Because of the low cost of the DCT-700, we are able to price Television Plus at just \$2.95 above expanded basic service.

Since August, we have installed 5,553 DCT-700 boxes. Our customers love the product, especially at the price of just \$2.95. We are averaging about 720 boxes installed per week. For our small cable company, this customer demand is unprecedented. Unfortunately, if the DCT-700 does not receive a CableCARD waiver, we will need to use a different Motorola set-top, the DCH-100. It will cost almost three times as much as the DCT-700, and we will have no choice but to raise the price of Television Plus accordingly.

I know that increasing the cost of Television Plus will deter price sensitive customers from switching to our all-digital product. They will not enjoy the benefits of that service, and it will have a significant negative impact on the ability and timing of going "All Digital."

ARMSTRONG UTILITIES, INC.
ONE ARMSTRONG PLACE ■ BUTLER, PA 16001
724-283-0925 ■ FAX 724-283-9655

Ms. Heather Dixon
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Armstrong strongly supports the prompt grant of Comcast's waiver request, and we respectfully request that the Commission grant Comcast's waiver now.

If you would like more information, I would welcome your call at 724-283-0925.

Thank you for your consideration.

Best regards,

A handwritten signature in black ink, appearing to read 'Jeffrey A. Ross', with a stylized flourish at the end.

Jeffrey A. Ross
President – Armstrong Utilities, Inc.

cc: Donna Gregg *donna.gregg@fcc.gov*
Matthew M. Polka *mpolka@americancable.org*