



Sony Electronics Inc.

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November 8, 2006

EX PARTE, VIA ECFS

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

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

Dear Ms. Dortch:

On November 7, 2006, Joel Wiginton, Vice President and Senior Counsel, Government and Industry Affairs, Sony Electronics Inc. (“Sony”), and Natalie Roisman of Akin Gump Strauss Hauer & Feld LLP, counsel to Sony, met with Rudy Brioché of Commissioner Adelstein’s office.

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 non-OCAP retail products that would give consumers access to basic interactive services, including video-on-demand and interactive pay-per-view programming. This approach would build on today’s CableCARD specification and would require that retail devices have access to the navigation data or metadata necessary to construct a CE proprietary user interface.

Under Sony’s proposal, CE manufacturers would have the option to include OCAP in products designed to access basic interactive services, and 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 urge the Commission to mandate certain changes to OCAP and the CableCARD Host Interface License Agreement (“CHILA”). In addition, Sony intends to propose that all cable systems deploy OCAP by a date certain and that a substantial percentage of leased cable devices be required to utilize OCAP.

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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/ Joel Wiginton

Joel Wiginton  
Vice President and Senior Counsel  
Government and Industry Affairs  
Sony Electronics Inc.

cc: (via electronic mail)  
Rudy Brioché