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November 14, 2006

Rudy Brioché
Legal Advisor to Commissioner Adelstein
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: Multi-Stream CableCARD Interface for Unidirectional Digital Cable Ready Devices, CS Docket No. 97-80

Dear Mr. Brioché:

As you know, the Commission has asked the cable industry to report periodically on its efforts to develop and deploy a multi-stream CableCARD (“M-Card”), particularly for use in Unidirectional Digital Cable Ready Products (“UDCPs”). *See* Second Report and Order in CS Docket No. 97-80, 20 FCC Rcd 6794, 6814-15 (¶ 39)(2005). As the Commission has recognized, UDCPs that can make use of M-Cards in multi-stream mode will enable features such as recording one scrambled channel while watching another. *Id.*

Yesterday, CableLabs announced that, with the assistance of consumer electronics parties including representatives from TiVo, Motorola, Soleki Systems Corporation, Digeo Interactive, Digital Keystone, and ViXS, it has reached an agreement on new testing procedures to verify UDCPs that have an M-Card interface which permits the use of an M-Card in multi-stream mode. In order to expedite the availability of such a test suite, CableLabs has posted it at the CableLabs’ web site, www.cablelabs.com/udcp. Beginning in January, 2007, CableLabs will offer testing of UDCPs for conformance to the M-CARD test suite as it does for UDCP conformance to the single-stream CableCARD interface.

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I am attaching for your convenience, a copy of the CableLabs Press Release announcing this development. We have previously advised the Commission that CableLabs has qualified M-Cards from Motorola and Cisco/Scientific-Atlanta. Once retail products that use M-Cards in multi-stream mode are certified/verified, they can be brought to market and will work in multi-stream mode on cable systems.

If you have any questions, please contact me.

Sincerely,

/s/ Neal M. Goldberg

Neal M. Goldberg

Attachment

cc: Donna Gregg, Chief, Media Bureau
Andrew Long
Rick Chessen
Brendan Murray
Marlene H. Dortch (for inclusion in CS Docket No. 97-80)

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FOR IMMEDIATE RELEASE

Multi-stream Capability for “Plug and Play” Devices

Louisville, Colo. November 13, 2006 – Working in conjunction with various technology providers, CableLabs® has opened a streamlined process under which retail “Plug and Play” devices can receive multiple streams of programming from new Multi-stream CableCARD™s (or M-Card™). The CableLabs effort was supported by TiVo, Motorola, Digeo, Solekai, Digital Keystone, and ViXS.

The M-Card interface will allow multiple digital video streams to be decrypted simultaneously, even on unidirectional devices. Thus, a cable subscriber using an M-Card-enabled “Plug and Play” device can view one cable channel, while recording another. It is expected that DVR type devices will be the first to make use of the new Multi-stream interface.

CableLabs has published new testing procedures to verify M-Card compatibility. In order to speed the availability of M-Cards for “Plug and Play” devices, CableLabs will begin offering verification testing of the Multi-stream interface beginning with CableLabs Certificate Wave 49 in January 2007. After initial verification, manufacturers may self-verify that their M-Card enabled devices are compliant.

“Through the OpenCable™ testing and specification drafting process, CableLabs is uniquely able to bring the cable and consumer electronics industries together to produce innovative retail products,” said Richard R. Green, President and CEO of CableLabs. “Working cooperatively, our industries can delivery a better product for our mutual customers,” he added.

About CableLabs

Founded in 1988 by members of the cable television industry, Cable Television Laboratories is a non-profit research and development consortium that is dedicated to pursuing new cable telecommunications technologies and to helping its cable operator members integrate those advancements into their business objectives. Cable operators from around the world are members. CableLabs maintains web sites at www.cablelabs.com; www.packetcable.com; www.cablemodem.com; www.cablenet.org; and www.opencable.com.

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