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# LATHAM & WATKINS<sup>LLP</sup>

March 9, 2007

## VIA COURIER

Federal Communications Commission  
Media Bureau  
P.O. Box 358205  
Pittsburgh, PA 15251-2505

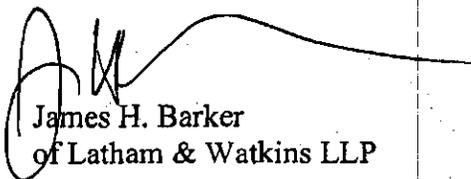
Re: In the Matter of CenturyTel, Inc. Request for Waiver of 47 C.F.R. § 76.1204(a)(1)

Dear Sir or Madam

On behalf of CenturyTel, Inc. we submit an original and four (4) copies of the above-referenced Request for Waiver. Also enclosed is a completed FCC Form 159 authorizing credit card payment in the amount \$1,250. We have also filed a copy of this Request electronically in CS Docket 97-80.

Please contact me if you have any questions regarding this matter.

Sincerely,



James H. Barker  
of Latham & Watkins LLP

Attachments

cc: Karen Brinkmann

### FIRM / AFFILIATE OFFICES

Barcelona	New Jersey
Brussels	New York
Chicago	Northern Virginia
Frankfurt	Orange County
Hamburg	Paris
Hong Kong	San Diego
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Los Angeles	Shanghai
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Moscow	Tokyo
Munich	Washington, D.C.

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON, D.C. 20554**

In the Matter of

CenturyTel, Inc. Request for  
Waiver of 47 C.F.R. § 76.1204(a)(1)

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CSR- \_\_\_\_\_

To: Chief, Media Bureau

**REQUEST FOR WAIVER**

Pursuant to Sections 629(c) and 706 of the Telecommunications Act of 1996, the Commission's Orders, and Sections 1.3, 76.7, and 76.1207 of the Commission's Rules, CenturyTel, Inc. on behalf of its subsidiaries CenturyTel TeleVideo, Inc. and CenturyTel/Teleview of Wisconsin, Inc. (together, "CenturyTel") respectfully requests that the Commission grant a limited waiver of the "integration ban" requirement set forth in Section 76.1204(a)(1) of the Commission's Rules.

A waiver would allow CenturyTel to continue to place into service low-cost, limited-function Motorola DSR 470 and refurbished DCT 2000 integrated set-top boxes after July 1, 2007 and until February 17, 2009. Grant of the instant request will allow CenturyTel to make the capital expenditures necessary to transition to a digital network capable of supporting multi-channel video programming and other advanced services. The set-top box models covered by this request, detailed specifications for which are provided in Exhibits A and B, are of the type that the Commission has stated are most suitable for waiver, as they do not include any of the following capabilities: high-definition ("HD") output, multiple tuners, digital video recorders

("DVR"), or broadband Internet access.<sup>1</sup> Furthermore, the CenturyTel cable systems covered by the instant waiver request are small systems passing approximately 21,400 homes in small, rural communities in Wisconsin, Iowa, and Colorado. Information about CenturyTel's specific systems and markets covered by this waiver request is set forth in Exhibit C. These are precisely the types of systems the Commission has recognized would have difficulty in complying with the July 1, 2007 deadline.

Finally, CenturyTel has requested targeted relief that is limited in scope and that will achieve a migration to a digital network within a clearly-defined time frame. Grant of CenturyTel's requested waiver will benefit consumers and will not impede Congress's and the Commission's objective to foster a competitive market for navigation devices. Therefore, the waiver is in the public interest, is consistent with FCC precedent, and should be granted.

#### **I. THE COMMISSION HAS AMPLE AUTHORITY TO WAIVE SECTION 76.1204(A)(1)**

Section 629(c) of the Telecommunications Act of 1996 and Section 76.1207 of the Commission's Rules authorize the Commission to grant waivers of the integration ban. CenturyTel's waiver request is for low-cost, limited-capability devices as described in the Commission's *Second Report and Order* deferring the integration ban to July 1, 2007, and grant of a waiver in this case would be consistent with that order's waiver standard. Moreover, Sections 1.3 and 76.7 of the Commission's Rules justify the grant of CenturyTel's waiver request so that CenturyTel may continue to migrate its subscribers—the majority of whom are extremely cost-sensitive—to a digital network by February 2009.

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<sup>1</sup> *Commercial Availability of Navigation Devices*, CS Docket 97-80, Second Report and Order, 20 FCC Rcd 6794, ¶ 37 (2005) ("*Second Report and Order*").

A. Waiver Under Section 629(c) of the Telecommunications Act of 1996

CenturyTel's request satisfies the waiver standard contained in Section 629(c) of the Telecommunications Act of 1996 and Section 76.1207 of the Commission's Rules.<sup>2</sup> Section 629(c) provides that waivers should be granted "to assist the development or introduction of a new or improved multichannel video programming or other services offered over multichannel video programming systems, technology, or products."<sup>3</sup> This justification indisputably is present here. Denial of the instant waiver request would require substantial expenditures to upgrade CenturyTel's systems and acquire new set-top boxes. Significant investment in CableCARD set-top boxes that can continue to receive analog signals – an essential service given that only a small percentage of CenturyTel's subscribers have transitioned to digital – will deprive the company of opportunities to develop and introduce new or improved multi-channel video programming and other services.

Customer price sensitivity is one of the most important factors impeding the transition to a digital cable system. The Commission has stated that the average cost to consumers of implementing the integration ban through CableCARD technology would be approximately \$ 2 - 3 per month per box,<sup>4</sup> that even this cost is "significant,"<sup>5</sup> and that "we wish to place as little of the cost burden resulting from the ban on the public ...."<sup>6</sup> Because the average U.S. home has

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<sup>2</sup> Telecommunications Act of 1996, Pub. L. No. 104-104, § 629(c), (codified as amended at 47 U.S.C. § 549(c)); 47 C.F.R. § 76.1207.

<sup>3</sup> 47 U.S.C. § 549(c).

<sup>4</sup> *Second Report and Order*, 20 FCC Rcd. at 6805, ¶ 27.

<sup>5</sup> See COMMUNICATIONS DAILY, May 12, 2006, Vol. 26, No. 92, at 6 ("[Commission attorney Joseph] Palmore conceded that the FCC[']s integration ban] solution could raise costs that customers could have to shoulder. Asked by [Chief Judge] Ginsburg if those would be 'significant,' Palmore said: 'The Commission is quite candid about that ....'").

<sup>6</sup> *Second Report and Order*, 20 FCC Rcd. at 6807-08, ¶ 27.

2.5 televisions, costs to comply with the integration ban can begin to approach hundreds of dollars annually per household.<sup>7</sup>

Thus, for these reasons, the continued deployment of low-cost set-top boxes for a limited time is a critical component of CenturyTel's digital transition strategy. The markets in which CenturyTel provides coverage have seen very low take-up rates for digital services.<sup>8</sup> Low-cost set-top boxes, such as the DSR 470 and DCT 2000, are essential to help transition cost-sensitive customers to a digital platform, and particularly in rural areas, to persuade existing digital customers to obtain set-top boxes for all of their televisions. Furthermore, CenturyTel needs to be able to provide a low-cost option to compete against the two direct broadcast satellite ("DBS") providers, DIRECTV and EchoStar, which offer limited-function, low-cost devices and are not subject to the integration ban.<sup>9</sup>

In this regard, there is no question that compliance with the FCC integration ban by July 1, 2007 would require CenturyTel to make sizeable, short-term expenditures to upgrade its headends and purchase CableCARD boxes that can pass both analog and digital signals. CenturyTel already has an inventory of DSR 470 set-top boxes. The DSR 470 is no longer manufactured; it relies on proprietary technology, and the DSR 470 is the only set-top box that a HITS Quick-Take system will accept. When purchased, the DSR 470 cost CenturyTel \$225 per box. Requiring CenturyTel to comply with the integration ban by July 1, 2007 would necessitate investments to upgrade systems to HITS Quick-Take Plus and expenditures to acquire new DCH

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<sup>7</sup> Statistical Abstract of the United States, U.S. Census Bureau at Table 1111 (2007), available at: <http://www.census.gov/prod/2006pubs/07statab/infocomm.pdf>.

<sup>8</sup> Take-up rates for digital services among CenturyTel customers remain low: 16.9% in Casco, WI; 18.2% in New Franken, WI; 0 in Randolph, WI; 0 in Platteville, WI; 8.7% in Thorp, WI; 13.9% in Postville, IA; 29.3% in Eagle, CO. For further information about CenturyTel's systems, see Exhibit C.

<sup>9</sup> DBS operators are not subject to the integration ban, despite their support for a limited range of navigation devices. Imposing the additional costs of a CableCARD requirement on CenturyTel during the digital transition will hinder CenturyTel's ability to invest in new technologies and further place the company at a competitive disadvantage relative to national DBS providers.

200 CableCARD boxes, which will work with Quick-Take Plus.<sup>10</sup> In addition, CenturyTel's inventory of DSR 470 boxes, which it planned to roll out until February 2009, would be worthless as they would not be compliant with the integration ban. Notwithstanding the expense of upgrading its systems to HITS Quick-Take Plus to support a CableCARD ready box, the least expensive CableCARD box which can pass both analog and digital signals, the DCH 200, costs \$245. Grant of a waiver would allow CenturyTel to deploy its existing inventory of DSR 470 boxes before upgrading to HITS Quick-Take Plus, and then to purchase the refurbished DCT 2000 set-top box, which can pass both digital and analog signals, and which will cost CenturyTel approximately \$90. The DCT 2000 is an essential component of CenturyTel's strategy to transition its customers to digital packages.

Denial of CenturyTel's waiver request would require significant expenditures to purchase new \$245 DCH 200 set-top boxes, which would result in considerable cost increases for the consumer. Specifically, compliance with the integration ban likely would require a \$ 4 per month increase in the cost of the basic cable package and an increase in the set-top box rental fee of approximately \$ 4 per month. Compliance with the ban would translate into an average increase in cost for a CenturyTel subscriber of \$ 120 per year.<sup>11</sup>

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<sup>10</sup> CenturyTel's Casco, Wisconsin system illustrates the point. The Casco system operates on HITS Quick-Take, which can only interface with the DSR 470 set-top box. Motorola no longer manufactures this set-top box. CenturyTel plans to upgrade the system headend to Quick Take Plus, which will support use of Motorola DCT boxes. CenturyTel could then pass an HD signal. The low-cost, low-function DCT 2000 can pass both analog and digital signals and costs approximately \$90, whereas the comparable DCH 200 CableCARD box costs \$245 (approximately 2.5 times more per subscriber TV set). With respect to its Casco system, compliance with the integration ban by July 2007 will cost CenturyTel \$15,000 to \$27,000 to upgrade to Quick-Take Plus and purchase new CableCARD boxes. If a requested waiver is granted, customers requesting CableCARD compliant boxes would be provided those set-top boxes after the system is upgraded to Quick-Take Plus. Any customer requesting HD or DVR set-top boxes would also be given a CableCARD compliant set-top box. See Exhibit C for more information on CenturyTel's specific systems and markets.

<sup>11</sup> The \$ 120 figure is derived as follows: The \$ 4 basic rate increase per month includes the rental fee for the first STB. Assuming 2.5 boxes per household and a \$ 4 per month increase in the STB rental fee, the total increased cost for the average CenturyTel subscriber would be \$ 120 annually.

Cost increases of this magnitude would undermine CenturyTel's ability to transition its customers to digital cable. CenturyTel's customers are price-sensitive, and the ability to provide set-top boxes capable of passing both analog and digital signals at an attractive price point is essential to the successful transition to a digital platform. Grant of a waiver would allow CenturyTel to continue to place into service low-cost set-top boxes, which will permit continued viewing of analog and digital programming during the transition to a digital platform. By avoiding significant expenditures to purchase non-integrated set-top boxes capable of passing digital and analog signals, CenturyTel can invest, instead, in upgrading its system to prepare for the digital conversion and can develop and introduce advanced services such as HD and VOD.<sup>12</sup>

B. Waiver Under the Commission's Second Report and Order

Granting CenturyTel's waiver request is further justified pursuant to the waiver standard announced in the Commission's *Second Report and Order*. The Commission recognized that continued deployment of low-cost set-top devices that will permit viewing of analog and digital programming is an essential component of a successful strategy to migrate customers to a digital platform.<sup>13</sup> The Commission described the kind of set-top box most appropriate for a waiver as those low-cost devices that do not "contain personal video recording ("PVR"), high-definition, broadband Internet access, multiple tuner, or other similar advanced capabilities."<sup>14</sup> CenturyTel requests a waiver for devices that meet this standard. The Motorola DSR 470 and DCT 2000 can

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<sup>12</sup> Requiring CenturyTel to expend a significant portion of its capital budget to purchase non-integrated set-top boxes would be an inefficient and wasteful use of resources in view of recent breakthroughs in downloadable security solutions. The cable industry has made significant strides in the development of a downloadable security solution, the Downloadable Conditional Access System ("DCAS"), which the Commission has said would be compliant with Section 76.1204(a)(1). Expending substantial resources to acquire expensive CableCARD devices, when a far cheaper, downloadable security alternative will soon be available, would represent a waste of resources that CenturyTel could otherwise invest in improving its services and upgrading its systems in preparation for the digital transition.

<sup>13</sup> *Second Report and Order*, 20 FCC Rcd. at 6794, ¶ 37.

<sup>14</sup> *Id.*

support pay per view ("PPV"), but neither box includes HD output, PVR capability, multiple tuners, or broadband Internet access. Neither device enables subscribers to access VOD or supports the use of switched digital capabilities. The DCT 2000 costs less than \$100; the DSR 470 is in inventory, and CenturyTel has no plans to purchase additional DSR 470 boxes. Both boxes meet the limited-capability standard announced in the *Second Report and Order*. As contemplated by the *Second Report and Order*, the DSR 470 and DCT 2000 are inexpensive set-top boxes that will permit the viewing of digital programming on analog television sets during the transition to a digital network.

C. *Waiver Under Section 1.3 and 76.7 of the Commission's Rules and Section 706 of the Telecommunications Act of 1996*

CenturyTel's request also satisfies the general waiver standards of Section 1.3 and 76.7 of the Commission's Rules. The requested waiver would apply to CenturyTel's continued use of DSR 470 and DCT 2000 low-cost, limited-capability devices. These set-top boxes enable CenturyTel customers to view digitally delivered programming on their analog televisions. Digital penetration rates will remain low among CenturyTel subscribers if the benefits of digital service and programming require CenturyTel to pass hundreds of dollars of the increased cost of compliance with the integration ban on to consumers. CenturyTel's plan to transition to a digital network requires that consumers have access to inexpensive digital set-top boxes that will permit viewing of digital programming on analog televisions during the digital transition.

As the Commission recognized in granting a waiver to another small operator, BendBroadband, the need to continue to place into service low-cost set-top devices in order to support the transition to a digital platform presents good cause for a waiver under Sections 1.3

and 76.7 of the Commission's Rules.<sup>15</sup> In addition, grant of the instant waiver request will allow CenturyTel to focus its capital on the development of new digital and other advanced services. Section 706 of the Communications Act of 1996 encourages the deployment of advanced telecommunications capabilities to all Americans.<sup>16</sup> Migration to a digital network is consistent with the goals of Section 706 in that it will better enable customers to send and receive voice, data, graphics, and video by using high-speed broadband capability.<sup>17</sup> Because grant of a waiver is consistent with the goals announced in Sections 629(a) and 706 of the Telecommunications Act, the Commission's *Second Report and Order*, and Sections 1.3, 76.7, and 76.1207 of the Commission's Rules, the Commission has ample authority and should grant a limited waiver of Section 76.1204(a)(1)'s application to CenturyTel.

## II. CENTURYTEL'S WAIVER REQUEST IS LIMITED IN SCOPE AND TIME

CenturyTel requests a waiver, limited in scope and time, so that it may continue to place into service two low-cost, limited-capability set-top boxes, the DSR 470 and DCT 2000. In February 2009, its systems will be ready for conversion to a digital network. The limited nature of the waiver requested is a further reason justifying its grant.

The instant waiver request is limited in scope. The waiver would cover two low-capability set-top box models for use in a seven small, rural systems. CenturyTel provides cable services in small, rural communities in Wisconsin, Iowa, and Colorado. CenturyTel has approximately 10,000 cable subscribers, and its network passes approximately 21,400 homes.

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<sup>15</sup> *In the Matter of BendCable Communications, LLC d/b/a BendBroadband*, Memorandum Opinion and Order, 2007 FCC LEXIS 180, at \*28-29 (FCC 2007). BendBroadband has three times as many subscribers as CenturyTel. The Commission granted its waiver request to continue to place into service a set-top box, the Motorola DCT-700, which has greater capabilities than the DSR 470 and DCT 2000 set-top boxes for which CenturyTel requests a waiver here.

<sup>16</sup> Telecommunications Act of 1996, Pub. L. No. 104-104, § 706(a), (codified as amended at 47 U.S.C. § 157(a)).

<sup>17</sup> *Id.* at § 706(c).

Because grant of a waiver in the instant case would affect a very modest number of customers and would cover only two limited-capability set-top boxes, granting CenturyTel's waiver request would exert no material effect on the Commission's goal to foster greater competition in the market for navigation devices. Yet, for the reasons already discussed in Section I(A) of this petition, the cost for CenturyTel to comply with the integration ban would significantly undermine its ability to invest in developing other advanced capabilities for its customers.

The instant waiver request is limited in time to cover the period from July 1, 2007 to February 1, 2009. For the reasons discussed in Section I(A), a waiver in the instant case will allow CenturyTel's cost-sensitive customers to continue to receive digital and analog signals during the migration to a digital platform in February 2009. Granting the instant request for waiver of the Commission's integration ban that is limited in time would be consistent with the Commission's prior grants of a waiver.<sup>18</sup>

### **III. GRANT OF CENTURYTEL'S REQUESTED WAIVER WILL SERVE THE PUBLIC INTEREST**

In requiring cable operators to use separable security technology, the Commission aims to foster a competitive market for navigation devices, and thereby increase viewing choices for consumers. Granting CenturyTel's waiver request will not undercut – and indeed, ultimately will affirmatively promote – the Commission's goals. CenturyTel's number of cable subscribers is too small to exert any material effect on the effort to promote a dynamic, competitive market in navigation devices and CableCARDS.

The Commission has recognized that waivers for low-end devices, such as the Motorola DSR 470 and DCT 2000, will not undermine the objective to foster a competitive marketplace

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<sup>18</sup> See *In the Matter of BendCable Communications, LLC*, Memorandum Opinion and Order, 2007 FCC LEXIS 180, \*28-29 (FCC 2007) (granting BendBroadband's waiver request until it transitions to an all-digital network in 2008); *In the Matter of Cablevision Systems Corp.*, Memorandum Opinion and Order, 2007 FCC LEXIS 178, \*1 (FCC 2007) (granting Cablevision's request for a two-year waiver of the integration ban).

for navigation and CableCARD technology.<sup>19</sup> By contrast, continuing and expanding service to CenturyTel's customers in small and rural markets is itself an undeniably important public interest objective. Rural cable subscribers simply cannot be "left behind" in the transition to digital video services. Declining to impose the integration ban on the low-cost devices that CenturyTel wishes to continue to place into service for a limited time will not undermine the purpose of the 1996 Telecommunications Act or the Commission's regulations.

Indeed, granting CenturyTel's waiver request will promote the public interest by saving price-sensitive customers the cost of upgrading to expensive CableCARD technology and allowing CenturyTel to continue to invest in improved services and system upgrades. The 1996 Telecommunications Act had as its goal "the deployment ... of advanced communications capability to all Americans."<sup>20</sup> Operators like CenturyTel, which provide cable to small, rural communities, are essential to reaching the objective of greater service coverage and improved capabilities. CenturyTel's continued ability to provide a low-cost, set-top box is a pivotal feature of the company's goal to expand and improve services, including the move to a digital platform that will support HD and other advanced services. Grant of a waiver will enable CenturyTel to continue to make progress towards the goal of providing coverage and advanced services to rural, small communities. As it will promote the public interest and objectives of the 1996 Telecommunications Act, CenturyTel's waiver request should be granted.

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<sup>19</sup> *Second Report and Order*, 20 FCC Rcd. at 6807-08, ¶ 27.

<sup>20</sup> 47 U.S.C. § 157(a); *In the Matter of Possible Revision or Elimination of Rules under The Regulatory Flexibility Act*, 2005 FCC LEXIS 4990, \*22 (2005) (stating, "there is a continuing need to accommodate the special circumstances of smaller cable entities").

**IV. IF THE COMMISSION DOES NOT GRANT CENTURYTEL'S WAIVER REQUEST, IT SHOULD DEFER ENFORCEMENT OF THE INTEGRATION BAN**

If the Commission decides to deny CenturyTel's request for a waiver, it should defer enforcement of the integration ban until such time as CenturyTel is able to purchase CableCARD compliant set-top boxes or DCAS downloadable security is available, whichever is sooner. In its decision granting a waiver to BendBroadband, the Commission recognized, "the difficulties that small cable operators may face in complying with the July 1, 2007 deadline, particularly since manufacturers may prioritize orders from the largest cable operators."<sup>21</sup> If the Commission denies the instant waiver request, CenturyTel, like many small cable operators, will face tremendous difficulties in complying with the July 1, 2007 deadline for separated security as manufacturers prioritize orders from the largest providers.

The Commission noted that if it denies an operator's waiver request, an operator may petition the Commission to defer enforcement of the July 1, 2007 deadline. CenturyTel respectfully requests, if the Commission denies the instant waiver request, that the Commission defer enforcement of the integration ban's application to CenturyTel until such time as a DCAS downloadable security device is available or until such time as CenturyTel is able to acquire the set-top boxes necessary to comply with the integration ban, whichever occurs earlier.

**CONCLUSION**

The Commission has recognized that continued provision of low-cost, low-function set-top boxes "will not endanger the development of the competitive marketplace" for navigation and security devices.<sup>22</sup> Indeed, a waiver will allow CenturyTel to migrate its cost-sensitive subscribers to a digital platform by February 2009 by continuing to provide a low-cost device

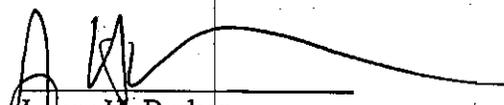
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<sup>21</sup> *In the Matter of BendCable Communications*, 2007 FCC LEXIS 180, at \*11 (FCC 2007).

<sup>22</sup> *Second Report and Order*, 20 FCC Rcd. at 6794, ¶ 37.

that can receive both analog and digital programming. Grant of CenturyTel's waiver request will promote the expansion and improvement of cable networks and programming in small, rural communities in Colorado, Iowa, and Wisconsin. For all the foregoing reasons, CenturyTel respectfully requests that the Commission grant its request for a waiver.

Respectfully submitted,



James H. Barker  
Cameron Smith\*  
of Latham & Watkins LLP  
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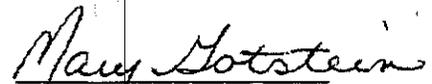
\*Admitted in New York. Not licensed to practice law in the District of Columbia; all work supervised by a member of the D.C. Bar.

Before the  
FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON, D.C. 20554

In the Matter of )  
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CenturyTel, Inc. Request for )  
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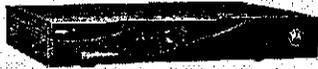
DECLARATION OF MARY GOTSTEIN

1. My name is Mary Gotstein. I am the Area Operations Manager of CenturyTel, Inc. I am familiar with CenturyTel's cable systems and requirements and have personal knowledge of the facts set forth in the foregoing Request for Waiver.
2. I have read the foregoing Request for Waiver, and declare under penalty of perjury that the facts contained therein are true and correct to the best of my knowledge, information, and belief.



Mary Gotstein  
Area Operations Manager  
212 Church Ave.  
Casco, WI 54205  
(920) 837-7776  
Executed on March 9, 2007

**EXHIBIT A:**  
**SPECIFICATIONS FOR THE MOTORLA DSR 470**



## DSR470 Digital Signal Receiver

Basic one-way receiver for digital, analog basic, and pay-per-view channels.

The Motorola DSR470 can deliver digital satellite feeds with local analog service.

The Motorola DSR470 digital satellite receiver provides interactive digital cable programming through a unique satellite delivery method. By converting satellite signals to cable-friendly methods of transmitting programming, the DSR470 gives you quick access to up to 200 channels of digital and analog programming over a single coaxial cable.

To facilitate this type of digital system, the DSR470 accepts program signals, authorization, and control commands like a satellite receiver, but is installed at the end of a coaxial cable. Using its unique design, the DSR470 offers a wide range of viewing options—the combined offerings of analog cable and digital satellite programming to cable subscribers. Additionally, Motorola has developed a unified digital/analog on-screen display so the viewer can seamlessly scan all available channels.

Check with your local cable service provider for availability of this product in your area.

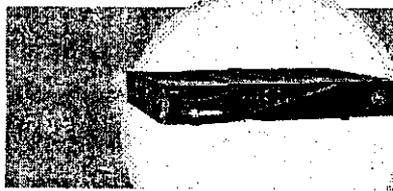
### BENEFITS

- Cable and satellite technologies integrated and delivered in a single digital entertainment receiver
- Integrated program guide for seamless transition between analog and digital channels
- Pay-Per-View (PPV) for movies, sports, and special events
- Dolby® AC-3 surround sound when available on satellite signal
- Parental controls to block programming and limit access to underage viewers
- Optional 4:1 remote control available (for DSR470, TV, VCR/DVD, and stereo)

# CONNECTEDMOTO



MOTOROLA  
Digital Signal Receiver



# DSR470 Digital Signal Receiver



## Technical Specifications

### GENERAL

#### ENVIRONMENT

Temperature 0° to -40°C (ambient)  
Humidity 95% relative

#### SPECIFICATIONS

WidthxHeightxDepth 13.6 x 2.5 x 15  
Weight 11 lbs  
Power Input 115 V ± 10% AC, 60 Hz (nominal)  
25 W (maximum)

Regulatory Compliance UL listed, CSA certified  
Limited Warranty 1 year

#### CABLE INPUT

Frequency 54 to 860 MHz  
Impedance 75 W  
Analog Input Level 0 dBmV to +15 dBmV  
Digital Input Level  
-18 dBmV to +5 dBmV (64 QAM)  
-12 dBmV to +5 dBmV (256 QAM)  
Noise Figure @ 10 dBm input <10 dBmV

#### DIGITAL PROCESSING

Demodulation 64 and 256 QAM  
Symbol Rates  
5.056941 (64 QAM)  
4.966862 and 5.360537 (256 QAM)

#### VHF OUTPUT

Impedance 75 W  
Channel 3 and 4  
Level, Video 66 dBuV ± 3 dB from VHF modulator  
Audio Mono, SAP (menu selected)

#### VIDEO

Output Level 1 V p-p into 75 W  
De-emphasis 525 line CCIR Rec. 405-1

### AUDIO

Modes Digital stereo (stereo or surround), S/PDIF for AC-3 where available, analog stereo (BTSC)

#### IR REMOTE CONTROL

Operational Range 35 feet  
± 22.5° from center (horizontal axis)  
± 13.0° from center (vertical axis)

#### UHF REMOTE CONTROL

Operational Range 150-foot radius from unit

#### ASYNCHRONOUS DATA

Data Rate 1200, 2400, 4800, 9600, and 19200 bps  
Format Asynchronous 10-bit characters transmitted LSB first  
Mode Simplex  
Interface RS-232 voltages and impedance levels  
Connector Mini phone

#### HIGH-SPEED DATA

Data Rate 29.27 Mbps ± 20 ppm  
Format AMI encoded with 8% minimum transition density  
Multiplex MPEG-2 compatible  
Signal Level 0.5 V p-p ± 20% AC coupled into 110 W  
Connector DB-9

#### MODEM REPORTBACK INTERFACE

Standard Bell 212A  
Data Rate 1200 baud  
Connector RJ-11 telco plug

#### DIGICIPHER® II AUDIO (ANALOG)

Stereo Outputs 2  
Impedance 110 W maximum  
Output Level 5.66 V p-p ± 10% into 2 kW load with 0 dBFS digital input

#### Frequency Response

THD 8 p-1.0 Dp, 20 Hz to 20 kHz  
0.3% maximum from 20 Hz to 20 kHz referenced to +10 dBm encoder  
SNR 85 dB minimum

#### Stereo Channel Isolation

60 dB minimum  
**DIGICIPHER® II AUDIO (DIGITAL)**  
Stereo Outputs 1  
Impedance 75 W  
Signal Level 0.5 p-p ± 20% into 75 W load  
Connector RCA  
Format Dolby AC3 or PCM

#### DIGICIPHER® II COMPOSITE VIDEO

Outline Level 1.0 C p-p ± 10%, sync tip to reference white  
Frequency Response (NTSC) ± 1.0 dB, 1 kHz to 4.2 MHz  
C-L Delay Inequality ± 50 nsec  
Differential Gain 5.0% p-p maximum (10-90% APL)  
Differential Phase 5.0° p-p maximum (10-90% APL)  
Luminance SNR 57 dB

#### CABLE VIDEO (ANALOG)

Frequency Response +1.58 to -1.94 dB, 0.5 to 3.0 MHz  
Differential Gain 8.0% p-p maximum  
Differential Phase 8.0° p-p maximum  
S/N 49 dB minimum @ 6 dBmV (unified weighing 100 kHz to 4.2 MHz)

#### CABLE AUDIO (ANALOG)

Frequency Response ± 3.0 dB, 50 Hz to 10 kHz  
Harmonic Distortion 2.0% maximum @ 1 kHz

To view our full line of Connected Home Solutions, visit our Web site at [broadband.motorola.com/consumers](http://broadband.motorola.com/consumers)

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**EXHIBIT B:**  
**SPECIFICATIONS FOR THE MOTORLA DCT 2000**

## MOTOROLA DCT2000 FEATURES AND INTERFACES

### FEATURES

#### > Standard Features

- MPEG-2 main level profile video processor
- ATSC standard Dolby Digital® (AC-3) audio processor
- ITU standard 64/256 QAM/FEC/forward adaptive equalizer
- On-board real-time RF return (256Kbps)
- High-resolution, bitmapped graphics display (2.14-18-ls)
- Clear analog channel processing
- 54-860MHz tuner
- DES-based encryption/DCII access control
- Digital diagnostics
- 2.048Mbps out-of-band data receiver
- Macrovision copy protection
- Wide screen (16 x 9) video support
- 4 line vertical blanking interval pass-through capability (closed caption)
- BTSC stereo decoder
- Full feature access from front panel
- Messaging capabilities

#### > Optional Features

- Motorola and compatible analog descrambling
- RF 1
- IR blaster tether
- RF bypass switch or A/B switch
- Telephone modem (1.44bps)
- S-Video output
- S/PDIF-Dolby AC-3 output
- Optical AC-3 output

### INTERFACES

#### > Standard Interfaces

- RF, baseband (video, I/R audio) ports
- Audio loop through connector
- IR blaster port
- Switched accessory outlet
- RS 232 Serial Port

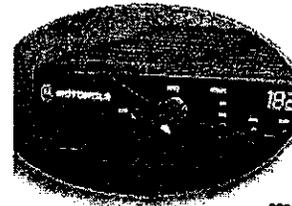
MOTOROLA

Motorola DCT2000

## Motorola's most popular interactive digital set-top terminal boasts a wide array of capabilities, ease of use and affordability.

State-of-the-art digital compression technology makes it possible for the Motorola DCT2000 to provide a wealth of new revenue-generating services. Platform versatility allows the Motorola DCT2000 to grow as your home broadband access needs grow. Its 64 and 256 QAM digital processing technology significantly boosts channel capacity while delivering stunningly vivid video and audio.

The Motorola DCT2000 can be configured to support real-time, reverse path communications, and uses DigCipher® II,



Motorola's Emmy-award-winning access control and encryption technology. This provides worry-free access to such interactive

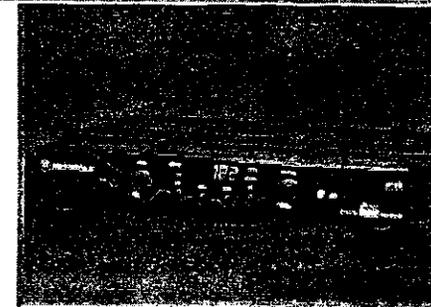
services as VOD, Internet, e-mail,

home shopping and more. The advanced user

features and capabilities of the Motorola DCT2000

support a host of new services and provide

an unparalleled level of flexibility and control.



- > Hybrid digital/analog terminal
- > MPEG-2 video and Dolby Digital® audio
- > Advanced security via Motorola DC-II Conditional Access and Harmony DES-based encryption
- > Supports Open Cable/Harmony specifications
- > Open architecture supports downloaded third-party software applications
- > High-resolution, on-screen graphics display
- > Real-time interactivity for use in VOD systems and Internet access



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**EXHIBIT C:**  
**CENTURYTEL SYSTEMS COVERED BY WAIVER**

**I. CASCO, WI**

**History:** Small, rural analog system in northeast Wisconsin.

**Coverage:** System serves residents of the Village of Casco, Village of Luxemburg, Village of Forestville, and portions of the township of Luxemburg and Casco.

**II. NEW FRANKEN, WI**

**History:** Small, rural analog system in northeast Wisconsin.

**Coverage:** System serves residents in the townships of Scott, Red River, and Green Bay.

**III. RANDOLPH, WI**

**History:** Small, rural analog system in southern Wisconsin.

**Coverage:** System serves residents in the villages of Fall River, Rio, Cambira, Randolph, Pardeeville, Wyocena, and Friesland and in the townships of Fountain Prairie, Lowville, Randolph, Courtland, Fox Lake, Pacific, Fort Winnebago, Wyocena, Westford, and Springvale.

**IV. PLATTEVILLE, WI**

**History:** Small, rural analog system in the southwest corner of Wisconsin.

**Coverage:** System serves residents in the city of Platteville, Wisconsin and the surrounding townships of Belmont & Platteville.

**V. THORP, WI**

**History:** Small, analog system in western Wisconsin.

**Coverage:** System serves residents of the City of Thorp.

**VI. POSTVILLE, IA**

**History:** Small, analog system in northeast Iowa.

**Coverage:**

System serves residents of the City of Postville. IA.

**VII. EAGLE, CO**

**History:**

Small, analog system west of Denver and Vail, Colorado.

**Coverage:**

System serves residents of the cities of Gypsum and Eagle, and part of Eagle County.