



March 27, 2007

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

**In Re:            CS Docket 97-80, Commercial Availability of Navigation Devices**

Secretary Dortch:

Pursuant to Section 1.1206(b)(2) of the Federal Communications Commission's (Commission's) rules, we hereby notify you that on March 26, 2007, I met with Rudy Brioché, Legal Advisor to Commissioner Adelstein. The attached letter explains what was discussed during this meeting.

Pursuant to the Commission's rules, one copy of this notice is being filed electronically with the Commission. If you require any additional information please contact the undersigned at (202) 371-6953.

Respectfully submitted,

/s/

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Steve B. Sharkey  
Director, Spectrum and Standards Strategy  
Motorola  
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Washington, DC 20004  
(202) 371-6953

CC: Rudy Brioché, Legal Advisor to Commissioner Adelstein

Attachment



March 20, 2007

Chairman Kevin J. Martin  
Federal Communications Commission  
445 12th Street, S.W.  
Washington, DC 20554

**In Re:            CS Docket 97-80, Commercial Availability of Navigation Devices**

Dear Chairman Martin:

In response to the Federal Communications Commission's (Commission's) recent *Public Notice* regarding downloadable security,<sup>1</sup> and as a leading provider of set-top boxes (STBs) and conditional access solutions, Motorola is pleased to inform the Commission of the development of "Downloadable MediaCipher" (DM). While Motorola continues to develop CableCards and a broad line of CableCard-compatible navigation devices, DM offers operators another option to comply with the integration ban. Motorola's DM satisfies the Commission's goal of a low-cost downloadable security solution that separates the conditional access function from the STB while avoiding the costs associated with hardware solutions for the physical separation of the security. The DM solution thus supports operator and Commission efforts to provide consumers the lowest cost option for receiving the benefits of digital programming and assists operators in transitioning to all digital networks, thereby freeing up much needed capacity for broadband and digital programming. Importantly, consistent with the Commission's goal of "common reliance," Motorola will make DM available for licensing to consumer electronics manufacturers for downloading to any navigation device, whether the device is offered by cable operators for lease or at retail for sale.<sup>2</sup>

In the Commission's *Public Notice*, it reiterated that downloadable security is a viable option for cable operators seeking to comply with the integration ban. As Beyond Broadband Technology (BBT) noted, downloadable security has the twin benefits of addressing the Commission's goals of separable security and expediting the delivery of digital programming to consumers. Given the Commission's *Public Notice* regarding the acceptability of downloadable security for complying with the integration ban, Motorola's research labs immediately accelerated work on a low-cost downloadable security solution. The result of this work is the introduction of DM. Motorola's DM separates the STB's conditional access function from its basic operation and provides security in a downloadable form (*i.e.*, it is downloaded to the STB or other navigation devices at the customer's location).

Motorola's DM offers several public interest benefits in addition to offering cable operators a method of complying with the Commission's integration ban. One of the greatest benefits of DM is that it is fully compatible with the existing MediaCipher networks and systems, including CableCARDS. For

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<sup>1</sup> Commission Reiterates that Downloadable Security Technology Satisfies the Commission's Rules on Set-Top Boxes and Notes Beyond Broadband Technology's Development of Downloadable Security Solution, *Public Notice*, DA 07-51 (rel. Jan. 10, 2007) ("*Public Notice*").

<sup>2</sup> See Implementation of Section 304 of the Telecommunications Act of 1996: Commercial Availability of Navigation Devices, *Second Report and Order*, 20 FCC Rcd. 6794 (2005).

example, STBs with DM can operate in the same homes as CableCARD-based navigation devices. As the Commission is aware, as bandwidth consumption continues to increase, cable operators must maximize their use of bandwidth to increase system capacity. Consistent with this goal, DM allows operators to migrate to digital and HDTV efficiently and at a significantly lower cost than any other solution currently available. Motorola's DM is also an economically expedient solution as it does not require that any headend equipment be replaced for systems using MediaCipher. This makes DM the most cost effective method, to date, for operators to comply with the Commission's integration ban requirement. These savings will allow operators to continue to develop innovative services for their customers and to deploy them as expeditiously as possible. All of these features will help to achieve the Commission's goal of enhancing and ensuring a vibrant competitive market for the delivery of video programming.

The Commission's *Public Notice* noted BBT's development of a downloadable security solution as an option for providers seeking to comply with the Commission's integration ban. In addition to Motorola's ongoing efforts to develop and deploy a robust line of CableCARD compatible navigation devices, Motorola has now developed a downloadable security solution that is a flexible, low-cost option for operators to comply with the integration ban. The DM solution can be integrated into consumer electronics equipment and Motorola will license DM to consumer electronics manufacturers. Motorola looks forward to working with the Commission, cable operators and equipment manufacturers to ensure that the Commission's objectives of common reliance and separable security are met.

Respectfully Submitted,

/s/

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CC: Commissioner Michael Copps  
Commissioner Jonathan Adelstein  
Commissioner Deborah Tate  
Commissioner Robert McDowell