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May 16, 2007

VIA ECFS

Ms. Marlene H. Dortch
Federal Communications Commission
Office of the Secretary
445 12th Street, SW
Washington, D.C. 20554

Re: *Ex Parte* Communications in CS Docket 97-80

Dear Ms. Dortch:

This is to notify you that on May 16, 2007, Brian Markwalter, Vice President, Technology and Standards, CEA, and I met via teleconference with Michelle Carey, Senior Legal Advisor to Chairman Kevin Martin.

During our meeting, we discussed issues pertaining common reliance and the various downloadable security options that have been presented in this proceeding.

As CEA has discussed in filings, a platform for common reliance, besides being nationally portable, must include:

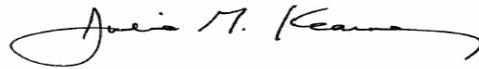
- (1) a national interface so that a DTV television receiver or competitive product can be nationally marketed and moved by the consumer from one local system to another,
- (2) manufacturer input into the specification and any planned changes, and review prior to final adoption,
- (3) reasonable host device implementation specifications,
- (4) self-certification of implementation,
- (5) support of competitive home networks,
- (6) true renewability to the software, including updates to the host end of the interface via firmware,
- (7) licensing terms that comport with FCC regulations limiting MSO control over devices to assurance against theft of service and harm to the cable network, and

(8) compliance with all other FCC regulations pertaining to cable systems and competitive availability of devices.

In sum, any downloadable security system endorsed by the FCC must be non-proprietary and have a standard national interface that is developed in an open standards body.

This letter is being provided to your office in accordance with Section 1.1206 of the Federal Communications Commission rules. A copy of this letter has been delivered by e-mail to Ms. Carey.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Julie M. Kearney", with a long, sweeping underline that extends to the right.

Julie M. Kearney
Senior Director and Regulatory Counsel

cc: Michelle Carey