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June 18, 2007

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

**Re: Petition of Digital Transmission Licensing Administrator LLC (“DTLA”), CS
Docket No. 97-80**

Dear Ms. Dortch:

We are pleased to submit approvals by four major motion picture studios for the use of the DTLA content protection technology known as “DTCP” for Internet Protocol (“DTCP-IP”) as a digital output protection technology for Unidirectional Digital Cable Products under the DFAST License.

On February 26, 2007, DTLA filed a petition concerning the process for CableLabs’ approval of DTCP as a digital output protection technology for Unidirectional Digital Cable Products under the DFAST License.

On March 9, 2007, the Motion Picture Association of America, Inc. (“MPAA”), in response to statements contained in the DTLA petition, informed the Commission that neither MPAA nor its major motion picture company members had approved DTCP-IP as a digital output protection technology for such cable devices, and that there were some unresolved issues regarding DTCP-IP.

Content providers like MPAA studios sell programming to specific distributors for specific uses or specific windows, often limited by specific time periods and geographic territories. They expect their distribution partners to respect and enforce these limitations, typically through contract, intellectual property right, or technology tools and licensing requirements. Under the current output approval process, CableLabs provides the technical review and conditions for new



outputs, with an alternative approval mechanism by four major motion picture studios, and with a right of appeal to the FCC. CableLabs has already approved several digital outputs, including IP outputs into the PC environment. Those output approvals reflected careful, negotiated arrangements between content protection technology proponents, content providers, and cable operators to assure that suitable protections are in place. Those arrangements are necessary to assure that cable customers can continue to receive high value programming and services over cable—which are obtained through programming negotiations, rather than through government guarantees.

DTLA sought an FCC ruling effectively granting DTLA an unconditional right to receive all content on every cable channel, regardless of distribution contract limitations and without protections in certain key areas. Approval had not been completed because those issues were unresolved.

We are now pleased to submit approvals by four major motion picture studios for the use of DTCP-IP as a digital output protection technology for Unidirectional Digital Cable Products under the DFAST License. The approvals note that certain requirements—such as localization of signals, compliance and robustness rules, and a role for studio content providers—have been met in the current DTCP licensing structure. The approvals provide for additional clarifications and adjustments in DTLA licensing to provide for revocation messages in the event of device compromise; clarification of DTLA's intellectual property statement; and a role for CableLabs with respect to such matters as changes, new outputs or redistribution from DTCP, and representation of programmer interests that are otherwise not covered by the current DTCP license.

With DTLA's follow-through on these studio requirements, CableLabs can now add DTCP-IP as a digital output protection technology in DFAST.

Very truly yours,

Davis Wright Tremaine LLP

A handwritten signature in black ink, appearing to be 'Paul Glist', written over a horizontal line.

Paul Glist

Enclosures

June 18, 2007
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cc: Michelle Carey - Senior Legal Advisor to Chairman Martin
Rick Chessen - Legal Advisor to Commission Copps
Rudy Brioché - Legal Advisor to Commission Adelstein
William Freedman – Acting Legal Advisor to Commissioner Tate
Cristina Chou Pauzé - Legal Advisor to Commissioner McDowell
Andrew Long
Steve Broeckaert
Michael Lance
John Wong
Alison Neplokh Greenwald
John Gabrysch
Brendan Murray
Thomas Horan
Monica Desai



Mitch Singer
Chief Technology Officer

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Tel: 310 244 8331 Fax: 310 244 2061
mitch_singer@spc.sony.com

June 11, 2007

Director of Requirements, APS Department
Cable Television Laboratories, Inc.
858 Coal Creek Circle
Louisville, CO 80027-9750

Sony Pictures Entertainment Inc. has reviewed the proposal from DTLA for approval of a new content protection technology—DTCP-IP—under CableLabs' DFAST Technology License Agreement for Unidirectional Digital Cable Products (DFAST).

The proposed technology provides link protection on device outputs under terms of the Digital Transmission Protection License Agreement for Adopters and the related Content Participant Agreement: Audiovisual Version, DTLA IP Statement, and Specifications. This link protection technology is subject to an established licensing regime that imposes specific compliance and robustness rules on implementers and also provides certain specific rights to content participants. Based on the above and our understanding that DTCP-IP provides localization for commercial cable content that flows through such protected outputs, we believe that DTCP-IP should be approved under the DFAST Technology License Agreement, subject to some minor clarifications and adjustments as set forth below.

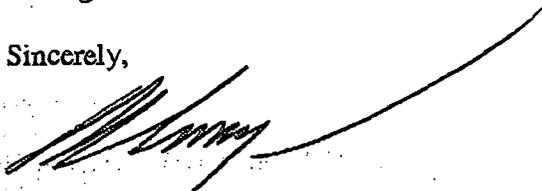
Based on these understandings, we approve DTCP-IP as a digital content protection technology under DFAST Compliance Rules for unidirectional content provided, however, that this approval is conditioned on CableLabs and DTLA satisfying the following two conditions:

SRMs. CableLabs shall, in the DFAST license, assure that all SRM files delivered across the CableCard interface shall in turn be delivered to the point of DTCP-IP functionality within the the DFAST licensed product. DTLA shall provide adequate assurances to CableLabs that the protections of the non-assert expressed in DTLA's IP Statement also extend to those who carry DTCP revocation or .SRM files.

Material Changes: This approval is based upon the documentation submitted by DTLA to CableLabs as of May 1, 2007, including the video transport protocol previously agreed with CableLabs. Because cable companies will be supplying content to DTCP that does not always originate with Content Participant licensees of DTLA, such as programs from smaller content providers or from cable companies' own programming networks, the entity CableLabs—as representative of the cable industry—should be provided with rights similar to those of Content Participants over material and substantial changes that DTLA may make to the DTCP Licenses

and Specifications. Such changes include, but are not limited to, approval of new outputs from DTCP-IP, mappings to new transports or media, changes in the scope of redistribution, and changes that may have a material and adverse effect on the integrity or security of the DTCP technology. Any such rights with respect to material changes granted to CableLabs would not be in a separate category from those granted to Content Participants. Instead, CableLabs would be considered in the position equivalent to an additional Eligible AV Content Participant under the DTCP Content Participant Agreement: Audiovisual Version and the DTCP Digital Transmission Protection License Agreement for Adopters. Thus, for the avoidance of doubt, CableLabs would have a single vote equivalent to and not greater than the vote of any other single Eligible AV Content Participant in exercising rights with respect to material changes. We acknowledge that to effectuate the foregoing, CableLabs and DTLA will need to enter into a mutually agreeable writing.

Sincerely,



Mitch Singer



The WALT DISNEY Company

Robert E. Lambert
Senior Vice President
Worldwide Technology Strategy and Development

June 13, 2007

Director of Requirements, APS Department
Cable Television Laboratories, Inc.
858 Coal Creek Circle
Louisville, CO 80027-9750

Disney Technology Operations and Licensing ("Disney") has reviewed the proposal from DTLA for approval of a new content protection technology—DTCP-IP—under CableLabs' DFAST Technology License Agreement for Unidirectional Digital Cable Products (DFAST).

The proposed technology provides link protection on device outputs under terms of the Digital Transmission Protection License Agreement for Adopters and the related Content Participant Agreement: Audiovisual Version, DTLA IP Statement, and Specifications. This link protection technology is subject to an established licensing regime that imposes specific compliance and robustness rules on implementers and also provides certain specific rights to content participants. Based on the above and our understanding that DTCP-IP provides localization for commercial cable content that flows through such protected outputs, Disney believes that DTCP-IP should be approved under the DFAST Technology License Agreement, subject to some minor clarifications and adjustments as set forth below.

Based on these understandings, Disney approves DTCP-IP as a digital content protection technology under DFAST Compliance Rules for unidirectional content provided, however, that this approval is conditioned on CableLabs and DTLA satisfying the following conditions:

SRMs: CableLabs shall, in the DFAST license, assure that all SRM files delivered across the CableCard interface shall in turn be delivered to the point of DTCP-IP functionality within the DFAST licensed product. DTLA shall provide adequate assurances to CableLabs that the protections of the non-assert expressed in DTLA's IP Statement also extend to those who carry DTCP revocation or .SRM files.

Material Changes: This approval is based upon the documentation submitted by DTLA to CableLabs as of May 1, 2007, including the video transport protocol previously agreed with CableLabs. Because cable companies will be supplying content to DTCP that does not always originate with Content Participant licensees of DTLA, such as programs from smaller content providers or from cable companies' own programming networks, the entity CableLabs—as representative of the cable industry—should be provided with rights similar to those of Content Participants over



Director of Requirements, APS Department
June 13, 2007
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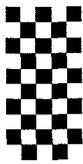
material and substantial changes that DTLA may make to the DTCP Licenses and Specifications. Such changes include, but are not limited to, approval of new outputs from DTCP-IP, mappings to new transports or media, changes in the scope of redistribution, and changes that may have a material and adverse effect on the integrity or security of the DTCP technology. Any such rights with respect to material changes granted to CableLabs should not be in a separate category from those granted to Content Participants. Instead, CableLabs would be considered in the position equivalent to an additional Eligible AV Content Participant under the DTCP Content Participant Agreement: Audiovisual Version and the DTCP Digital Transmission Protection License Agreement for Adopters. Thus, for the avoidance of doubt, CableLabs would have a single vote equivalent to and not greater than the vote of any other single Eligible AV Content Participant in exercising rights with respect to material changes.

We trust that this letter of approval, when taken together with approvals expected from other major content providers, will allow CableLabs (and the industry as a whole) to move forward with approval and use of DTCP/IP under the DFAST license.

Sincerely,

A handwritten signature in black ink, appearing to read "Bob Lambert", with a long, sweeping underline.

Bob Lambert
President, Disney Technology Operations and Licensing
Senior Vice President, Worldwide Technology Strategy
The Walt Disney Company



Paramount Pictures

5555 Melrose Avenue
Hollywood, CA 90038-3197
323-956-8990
Fax 323-862-1610
alan_bell@paramount.com

Alan E. Bell Ph.D.
Executive Vice President
and Chief Technology Officer

June 14, 2007

Director of Requirements, APS Department
Cable Television Laboratories, Inc.
858 Coal Creek Circle
Louisville, CO 80027-9750

To whom it may concern,

Paramount Pictures Corporation has reviewed the proposal from DTLA for approval of a new content protection technology—DTCP-IP—under CableLabs' DFAST Technology License Agreement for Unidirectional Digital Cable Products (DFAST).

The proposed technology provides link protection on device outputs under terms of the Digital Transmission Protection License Agreement for Adopters and the related Content Participant Agreement: Audiovisual Version, DTLA IP Statement, and Specifications. This link protection technology is subject to an established licensing regime that imposes specific compliance and robustness rules on implementers and also provides certain specific rights to content participants. Based on the above and our understanding that DTCP-IP provides localization for commercial cable content that flows through such protected outputs, we believe that DTCP-IP should be approved under the DFAST Technology License Agreement, subject to some minor clarifications and adjustments as set forth below.

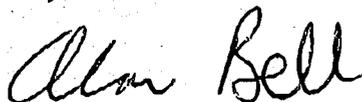
Based on these understandings, we approve DTCP-IP as a digital content protection technology under DFAST Compliance Rules for unidirectional content provided, however, that this approval is conditioned on CableLabs and DTLA satisfying the following two conditions:

SRMs. CableLabs shall, in the DFAST license, assure that all SRM files delivered across the CableCard interface shall in turn be delivered to the point of DTCP-IP functionality within the DFAST licensed product. DTLA shall provide adequate assurances to CableLabs that the protections of the non-assert expressed in DTLA's IP Statement also extend to those who carry DTCP revocation or .SRM files.



Material Changes: This approval is based upon the documentation submitted by DTLA to CableLabs as of May 1, 2007, including the video transport protocol previously agreed with CableLabs. Because cable companies will be supplying content to DTCP that does not always originate with Content Participant licensees of DTLA, such as programs from smaller content providers or from cable companies' own programming networks, the entity CableLabs—as representative of the cable industry—should be provided with rights similar to those of Content Participants over material and substantial changes that DTLA may make to the DTCP Licenses and Specifications. Such changes include, but are not limited to, approval of new outputs from DTCP-IP, mappings to new transports or media, changes in the scope of redistribution, and changes that may have a material and adverse effect on the integrity or security of the DTCP technology. Any such rights with respect to material changes granted to CableLabs would not be in a separate category from those granted to Content Participants. Instead, CableLabs would be considered in the position equivalent to an additional Eligible AV Content Participant under the DTCP Content Participant Agreement: Audiovisual Version and the DTCP Digital Transmission Protection License Agreement for Adopters. Thus, for the avoidance of doubt, CableLabs would have a single vote equivalent to and not greater than the vote of any other single Eligible AV Content Participant in exercising rights with respect to material changes. We acknowledge that to effectuate the foregoing, CableLabs and DTLA will need to enter into a mutually agreeable writing.

Sincerely,



Alan Bell, PhD
EVP/CTO
Paramount Pictures Corporation
(323) 956-8990



WARNER BROS.
TECHNICAL OPERATIONS INC.

Christopher J. Cookson
President

June 11, 2007

Director of Requirements, APS Department
CABLE TELEVISION LABORATORIES, INC.
858 Coal Creek Circle
Louisville, CO 80027-9750

Warner Bros. Technical Operations Inc. has reviewed the proposal from DTLA for approval of a new content protection technology—DTCP-IP—under CableLabs' DFAST Technology License Agreement for Unidirectional Digital Cable Products (DFAST).

The proposed technology provides link protection on device outputs under terms of the Digital Transmission Protection License Agreement for Adopters and the related Content Participant Agreement: Audiovisual Version, DTLA IP Statement, and Specifications. This link protection technology is subject to an established licensing regime that imposes specific compliance and robustness rules on implementers and also provides certain specific rights to content participants. Based on the above and our understanding that DTCP-IP provides localization for commercial cable content that flows through such protected outputs, we believe that DTCP-IP should be approved under the DFAST Technology License Agreement, subject to some minor clarifications and adjustments as set forth below.

Based on these understandings, we approve DTCP-IP as a digital content protection technology under DFAST Compliance Rules for unidirectional content provided, however, that this approval is conditioned on CableLabs and DTLA satisfying the following two conditions:

SRMs.: CableLabs shall, in the DFAST license, assure that all SRM files delivered across the CableCard interface shall in turn be delivered to the point of DTCP-IP functionality within the the DFAST licensed product. DTLA shall provide adequate assurances to CableLabs that the protections of the non-assert expressed in DTLA's IP Statement also extend to those who carry DTCP revocation or .SRM files.

Material Changes: This approval is based upon the documentation submitted by DTLA to CableLabs as of May 1, 2007, including the video transport protocol previously agreed with CableLabs. Because cable companies will be supplying content to DTCP that does not always originate with Content Participant licensees of DTLA, such as programs from smaller content providers or from cable companies' own programming networks, the entity CableLabs—as representative of the cable industry—should be provided with rights similar to those of Content Participants over material and substantial changes that DTLA may make to the DTCP Licenses

A Warner Bros. Entertainment Company

Cable Television Laboratories, Inc.

June 11, 2007

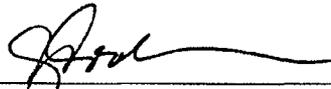
Page Two

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Sincerely,

WARNER BROS. TECHNICAL OPERATIONS INC.

By: _____


Christopher J. Cookson, President