

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554**

In the Matter of

Cablevision of Marion County, LLC Request
for Waiver of 47 C.F.R. § 76.1204(a)(1)

CSR-

To: Chief, Media Bureau

REQUEST FOR WAIVER

Pursuant to Section 706 of the Telecommunications Act of 1996 and Sections 1.3 and 76.7 of the Commission's rules, Cablevision of Marion County, LLC ("CMC") respectfully requests the same conditional relief from the integration ban¹ that the Commission previously granted to BendBroadband, GCI, and OneSource Communications.² In accordance with these orders, CMC has supplied an affidavit committing to move to an all-digital network by February 17, 2009 if this waiver is granted.

CMC provides cable television, high-speed Internet and telephone services to approximately 7000 customers in unincorporated areas near Ocala, Florida. Due to capacity constraints, CMC is limited in its ability to offer high-definition (HD) and video-on-demand (VOD) programming. To increase its HD and VOD capacity, and to develop new and improved broadband and other digital services, CMC would like to be able to

¹ 47 C.F.R. § 76.1204(a)(1) (second sentence).

² *Bend Cable Communications, LLC d/b/a BendBroadband Request for Waiver of Section 76.1204(a)(1) of the Commission's Rules*, CSR-7057-Z, Memorandum Opinion and Order, DA 07-47 (rel. Jan. 10, 2007) ("*BendBroadband Order*"); *GCI Cable, Inc. Request for Waiver of Section 76.1204(a)(1) of the Commission's Rules*, CSR-7130-Z, Memorandum Opinion and Order, DA 07-2010 (rel. May 4, 2007); *Millennium Telcom, LLC d/b/a OneSource Communications Request for Waiver Section 76.1204(a)(1) of the Commission's Rules*, CSR-7129-Z, Memorandum Opinion and Order, DA 07-2009 (rel. May 4, 2007).

transition to an all-digital network to reclaim the spectrum now used for analog channels. CMC would be able to complete this transition by February 17, 2009 (in advance of the DTV transition) if the Commission allowed it to continue to deploy certain low-cost integrated set-top boxes that are vital to consumer adoption of digital cable services.

Before CMC can eliminate analog video programming, it must assure that each of its customers has a digital set-top box for every analog television in their home. This can only be accomplished in the near-term if CMC continues to be allowed to deploy the integrated Motorola DCT-700, DCT-2500, DSR-410 and DSR-470 set-top boxes. The DCT-700 is the least expensive set-top box available today, at \$79. By contrast, Motorola's least expensive CableCARD-equipped device will cost nearly three times as much, approximately \$230.³ No other consumer electronics manufacturer has committed to make CableCARD-equipped set-top boxes at a price anywhere near the price of the DCT-700. Because a transition to all-digital requires a significant number of new set-top boxes, this enormous cost increase would prevent CMC from being able to migrate to all-digital prior to the 2009 DTV transition.

The DCT-2500 is functionally equivalent to the DCT-700 except that it includes an analog tuner in addition to its digital tuner. The device is similar to the DCT-1000 and DCT-2000 for which the Commission granted a waiver to GCI. CMC temporarily needs to use the DCT-2500 rather than the DCT-700 to encourage customers to switch to digital in areas where it will continue to broadcast in analog after the grant of the waiver (but of no later than its transition to all-digital by February 17, 2009).

³ *BendBroadband Order* at ¶ 22; see also CS Docket No. 97-80, Letter from Jean Kiddoo, Counsel to RCN, to Marlene Dortch, FCC, at 2, fn. 1 (Nov. 21, 2006) (indicating the total cost of a DCH-100 plus CableCARD to be \$232 per box).

In addition to the DCT-700 and DCT-2500, CMC also needs to be able to continue to deploy refurbished Motorola DSR-410 and DSR-470 devices where CMC now provides service using the HITS QuickTake platform. This service requires a specialized type of set-top box that has been discontinued and that no CE manufacturer has announced plans to develop with a CableCARD.⁴ The integration ban does not prohibit the use of refurbished, integrated devices, because such devices are not “new.”⁵ However, if the Commission believes that refurbished integrated devices cannot otherwise be deployed upon the effectiveness of the integration ban, it should apply the requested waiver to the low-cost, limited-function DSR-410 and DSR-470 devices, which are even more essential than the DCT-700 and DCT-2500 to CMC’s transition to all-digital because CMC has no other alternative. For purposes of the Commission’s waiver analysis, these devices are similar in functionality to the devices for which the Commission granted waivers to GCI.⁶

Under nearly identical facts, the Commission indicated that it would grant waivers to BendBroadband, GCI, and OneSource Communications for low-cost devices if used by the operator to have in place an all-digital network before February 17, 2009. The Commission found that an all-digital network would:

enable it to ensure that its cable subscribers will be able to view digital broadcast signals after the end of the DTV transition. It also may enable BendBroadband to provide additional HD content, which may facilitate the DTV transition by creating greater incentives for its subscribers to acquire digital television sets. Therefore ... a conditioned grant of the Waiver Request would facilitate BendBroadband’s rapid transition to an all-digital network (*i.e.*, by 2008), which was a critical factor in the

⁴ See CSR-7216-Z, James Cable’s Request for Waiver (May 15, 2007) at 10; *see also* CSR-7115-Z, Cequel Communications, LLC’s Request for Waiver (Dec. 5, 2006) at 12-15, fn. 31.

⁵ See CS Docket 97-80, Letter from Adams Cable Equipment to Chairman Martin (Apr. 18, 2007).

⁶ The technical specifications for the DCT-700, DCT-2500, DSR-410 and DSR-470 are attached hereto as Exhibit 1.

Commission's decision to consider waiver requests at all. ... [In addition, an all-digital network] would allow it to reclaim a considerable amount of spectrum within a clearly defined timeframe, which would enable it to provide consumers with advanced telecommunication capabilities, thereby furthering the goals of Section 706.⁷

Grant of a waiver to CMC is equally compelling for the same reasons. Grant of a waiver will facilitate CMC's transition to all-digital by February 17, 2009, and CMC would use reclaimed bandwidth to offer increased high-definition and video-on-demand programming and other advanced telecommunications capabilities.⁸

CMC has provided a sworn declaration from its President committing to transition to an all-digital network and to the conditions specified by the Commission in ¶ 27 of the *BendBroadband Order*. In this declaration, CMC proposes six month periods for notice and inventory requirements, rather than twelve months as specified in the *GCI Order*.

Although the requested waiver would allow until February 17, 2009 for the completion of the company-wide transition, CMC seeks the flexibility to be able to transition at least some of its systems by early 2008. A twelve-month notification or inventory requirement could therefore unnecessarily force CMC to delay the transition of a system, which would be contrary to the public interest.⁹

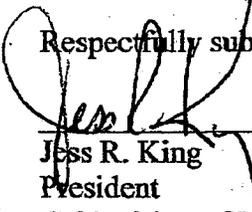
⁷ *BendBroadband Order* at ¶¶ 24-25. See also *Commercial Availability of Navigation Devices*, CS Docket 97-80, Second R&O, ¶ 37 (2005) ("achieving consumer choice by establishing a competitive market should not displace a low-cost set-top box option for MVPD subscribers. It is critical to the DTV transition that consumers have access to inexpensive digital set-top boxes that will permit the viewing of digital programming on analog television sets both during and after the transition. The availability of low-cost boxes will further the cable industry's migration to all-digital networks, thereby freeing up spectrum and increasing service offerings such as high-definition television."). While CMC believes that the DCT-700, DCT-2500, DSR-410 and DSR-470 should be granted waivers on this basis, in light of the Commission's clarification provided in footnote 56 of the *Charter Waiver Order*, it has not proffered paragraph 37 of the *Second Report and Order* as a proposed basis for waiver.

⁸ See Sworn Declaration of Jess R. King attached hereto.

⁹ See CSR-7130-Z, GCI Cable Inc. Compliance Filing (June 19, 2007) (proposing six month periods rather than 12 months).

The Commission is obliged to grant waivers where the application of a general rule to a specific situation would not serve the public interest underlying the rule, such as where the public interest benefits of a waiver exceed its costs.¹⁰ As demonstrated above, the public interest benefits of CMC's migration to all-digital by February 17, 2009 would be as significant as those deemed compelling by the Commission in granting waivers to BendBroadband, GCI and OneSource. The Commission should therefore grant CMC's request for a waiver from the integration ban.

Respectfully submitted,



Jess R. King
President
Cablevision of Marion County, LLC
8296 SW 103rd Street Road
Suite 3
Ocala, FL 34481

June 22, 2007

¹⁰ 47 C.F.R. § 76.7(i) ("The Commission, after consideration of the pleadings, may determine whether the public interest would be served by the grant, in whole or in part, or denial of the request . . ."); *see also id.* § 1.3 ("Any provision of the rules may be waived by the Commission on its own motion or on petition if good cause therefor is shown."); *KCST-TV, Inc. v. FCC*, 699 F.2d 1185, 1191-1192, 1195 (D.C. Cir. 1983) (vacating FCC denial of waiver request, holding that once the premise of the rule had been shown not to apply, the "logic of applying [the rule] collapses," and it was arbitrary to apply the rule); *WAIT Radio v. FCC*, 418 F.2d 1153, 1157-59 (D.C. Cir. 1969) ("[A] general rule, deemed valid because the overall objectives are in the public interest, may not be in the 'public interest' if extended to an applicant who proposes a new service that will not undermine the policy, served by the rule, that has been adjudged in the public interest."); *Northeast Cellular Telephone Co. v. FCC*, 897 F.2d 1164, 1166 (D.C. Cir. 1990).

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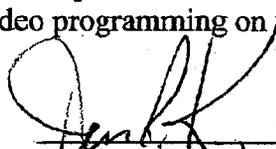
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CSR-

SWORN DECLARATION OF JESS R. KING

1. My name is Jess R. King. I am the President of Cablevision of Marion County, LLC ("CMC"). I have read the forgoing Request for Waiver, and declare under penalty of perjury that the facts contained therein and in this Declaration are true and correct to the best of my knowledge, information, and belief, and that I am authorized to give this Declaration on behalf of CMC.

2. If the foregoing Request for Waiver is granted, CMC will: (a) transition to an all-digital video service on or before February 17, 2009; (b) notify all of its analog video customers of its plans to go all digital at least six months in advance of that event; and (c) assure that at least six months prior to February 17, 2009 that it has in its inventory or has placed orders for enough set-top boxes to ensure that each of its customers can continue to view CMC's video programming on their television sets.



Jess R. King
President
Cablevision of Marion County, LLC

Dated: June 22, 2007

Exhibit 1

Technical Specifications for the Motorola DCT-700, DCT-2500, DSR-410, and DSR-470
Set-Top Boxes



DCT700 All-Digital Set-top

An interactive digital set-top with small size and big performance.

Motorola's DCT700 provides versatile interactivity in the all-digital network for expanded information and entertainment services.

The Motorola DCT700 is an all-digital set-top that provides you with the advantages of an all-digital network. Digital channels take up less room on your cable TV network. This results in increased "bandwidth" for more channels and services like high-definition TV (HDTV), electronic program guides (EPGs), pay-per-view (PPV), Video on Demand (VOD), and other on-demand information and entertainment services. The DCT700's capabilities are limited only by what your cable service provider offers. If your cable service provider eliminated analog channels in your area and replaced them with "all digital" channels, there would be even more room on the cable network system for additional services such as high-speed data, VOD, and high-definition content.

To decode the data used to transmit the digital channels, a separate set-top is required for each television in the home. The DCT700 provides digital channels to all your TVs through coaxial cable or analog (RCA-type) audio/video jacks.

Check with your local cable service provider for availability of the DCT700 in your area.

HIGHLIGHTS

- Supports services such as EPGs, PPV, and VOD
- Reclaims bandwidth allocated to analog channels
- Compatible with Motorola's award-winning secure MediaCipher® conditional access technology
- Two-way capability to enable interactivity
- Motion picture industry standard for coding and decoding video (MPEG-2)
- AC-3 standard for 5.1 Dolby® Digital Surround Sound

CONNECTEDMOTO



MOTOROLA
intelligence everywhere™



DCT700 All-Digital Set-top



Technical Specifications

STANDARD FEATURES

- MPEG-2 Digital Video Processor
- ATSC standard Dolby® Digital (AC-3) audio processor
- ITU standard 64/256 QAM/FEC/enhanced adaptive equalizer
- On-board real-time RF return (256 Kbps)
- Bitmapped graphics display (4-/8-bit)
- 90–860 MHz tuner
- DES-Based encryption/DCII access control
- Digital diagnostics
- Frequency agile 2.048 Mbps out-of-band data receiver
- Macrovision® copy protection
- IR support for remote control

STANDARD INTERFACES

- RF remodulator output (ch. 3, 4)
- Baseband video and audio outputs

OPTIONAL FEATURES

- Motorola Universal Remote Control (DRC450)

To view our full line of Connected Home Solutions, visit our Web site at broadband.motorola.com/consumers

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DCT2500



The Motorola DCT2500 is the evolution of the highly popular DCT2000 - the world's most widely deployed digital cable set-top - offering excellent performance and proven reliability at an attractive price point. It provides state-of-the-art digital compression technology, allowing operators a broad range of revenue-generating services.

The DCT2500 can be configured to support real-time, reverse path communications and uses DigiCipher® II, Motorola's Emmy award-winning access control and encryption technology. It can support a wide spectrum of interactive application services including VOD, Internet, Electronic Program Guide (EPG), Impulse Pay-Per-View, e-mail, home shopping and more.

Platform versatility means the Motorola DCT2500 can grow as your home broadband access needs grow. Its 64 and 256 QAM digital processing technology significantly boosts channel capability while delivering unsurpassed digital audio and video quality to TV viewing, giving broadband operators the flexibility and scalability they need.

In summary, the advanced user features and capabilities of the DCT2500 support a host of new services and provide an unparalleled level of reliability, usability and affordability.

The DCT2500 is a full featured digital set-top providing a wide array of capabilities, ease of use and affordability.

HIGHLIGHTS INCLUDE:

- Open architecture supports downloaded third-party software applications
- Scaled video
- High-resolution on-screen graphics
- Enhanced memory
- Advanced security via Motorola DC-II Conditional Access and Harmony DES-based encryption
- MPEG-2 Digital Video Processor
- ATSC standard Dolby® Digital (AC-3) audio processor



FEATURES

Features

- 175 MHz MIPS 32 CPU with 8K instruction and 8K data caches
- High speed, unified memory design with support for up to 64 Mbytes of DDR SDRAM
- 64 PID filters individually assignable to in-band or out-of band streams
- Video decoder with enhanced VBI data processing capability
- Analog/Digital video scaling (picture in graphics)
- High resolution graphics with support for multiple planes as well as current DCT2000 modes
- MPEG-2 Digital Video Processor
- ATSC standard Dolby Digital (AC-3) audio processor
- ITU standard 64/256 QAM/FEC/enhanced adaptive equalizer
- On-board real-time RF return (256 Kbps)
- Clear Analog Channel Processor with BTSC Decoder
- 54-860 MHz tuner
- DES-based encryption/DCII access control
- Digital diagnostics
- Frequency agile 2.048 Mbps out-of-band data receiver
- Macrovision copy protection
- Wide screen (16 x 9) video support
- Full feature access from front panel
- Switched accessory outlet

Optional Features

- Motorola and compatible analog descrambling
- IR blaster tether
- RF bypass or A/B switch
- Telephone modem (14.4 bps)
- S-Video output
- USB Host 1.1 Port
- Universal remote (DRC450)
- Keyboard

Standard Interfaces

- Dolby® 5.1 Digital Audio Output
- RF and Baseband Output (Video, L/R Audio) Ports
- IR Blaster Port
- TVPASS™ renewable security connector
- High/Low speed data output (27 and 2 Mbps)
- RS 232 Serial Port
- 4 digit, 7 segment LED display with IR receiver for remote and/or keyboard

General Specifications

Dimensions	17.13 W x 13.25 H x 2.75 D
Weight	8.6 lbs.

Specifications are subject to change without notice.



MGBI

Motorola, Inc.
Broadband Communications Sector
101 Tournament Drive
Horsham, PA 19044
1.800.523.6678
www.motorola.com/broadband

507287-001
5579-0802-0K

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DIGITAL ENTERTAINMENT RECEIVER DSR-410 MN/DS



KEY BENEFITS :

- » Support for multiple dual LNBs
- » Seamless cable and satellite technologies integrated and delivered in a single digital entertainment receiver
- » Digital satellite programming plus local content via analog cable
- » Parental controls to block programming and limit access to underage viewers
- » Instant-Pay-Per-View: Movies, Sports, Special Events
- » Dolby® AC-3 Pro Logic® Surround Sound

OPTIONAL ACCESSORIES :



- » Premium 4:1 Remote Control Unit (Satellite receiver, TV, VCR/DVD and stereo)
- » UHF Kit enables wireless control from anywhere in your house

Simple to Operate, Fun to Use, Easy to Set Up

The ultimate in entertainment value comes home with Motorola's Digital Entertainment Receiver. One of the first of its kind - a completely integrated satellite and cable receiver - to enhance basic analog cable service with digital satellite entertainment. The DSR-410-MN/DS offers more programming choices, excellent studio broadcast picture enabled by digital transmission, and a wealth of user features that make the entertainment experience an interactive and satisfying experience.

Watch local news. Seamless integration with cable television brings you the local channels that digital satellite alone does not currently deliver to rural areas.

Find a particular show or sporting event using the on-screen display. Look for programs by name, time, theme or title.

Create a set of favorite channels. Set a personal list of favorites, customized to your own viewing preferences from among hundreds of programming choices available via satellite.

Create a safe environment for your family. Set password-protected parental control guides to allow only the types of shows with the levels of violence, language and content that are appropriate for your family.

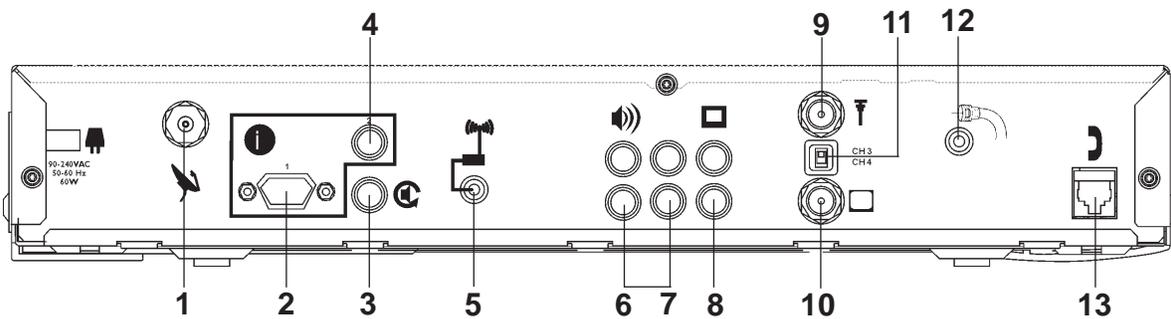
Watch a first-run movie - without leaving the house. A wide range of Instant-Pay-Per-View options lets you enjoy an entire evening's worth of great entertainment for a fraction of the cost - and effort - of a trip to the theater. You can also watch sports events and special "live" performances at the touch of a button.

Record your favorite programs. Flexible program timers let you pre-select or use your VCR to record anything you might miss - whether it is a specific event or a daily show.

Create a home theater. Dolby® AC-3 Pro Logic® Surround Sound lets you bring theater-style sound as well as CD-quality music to your home system.

With the latest in satellite programming and a receiver from one of the world leader in end-to-end digital transmission and satellite TV, Motorola, you get the best of cable and the satellite world delivered right into your own home.

DIGITAL ENTERTAINMENT RECEIVER DSR-410-MN/DS



BACK PANEL CONNECTIONS:

- 1 SATELLITE IN** accepts the input from multiple satellite dishes. Includes digital programming as well as the Interactive Program Guide.
- 2 MULTIMEDIA PORT** ready for future services and High Definition Television (HDTV) connection.
- 3 DOLBY DIGITAL OUTPUT** ready for Dolby AC-3, 5.1 surround sound.
- 4 ASYNCHRONOUS DATA** connection is used for data applications.
- 5 UHF REMOTE PORT** for the optional UHF remote receiver, letting you control your Digital Entertainment Receiver from any room in the house.
- 6 & 7 DUAL AUDIO OUTPUTS** for stereo sound or full surround audio.
- 8 DUAL VIDEO OUTPUTS** for the television and VCR.
- 9 ANTENNA IN** to allow an off air antenna connection for local broadcasts in the absence of cable or to provide alternate device pass-through i.e., VCR or DVD players.
- 10 OUT TO TV** supplies a VHF signal to your television.
- 11 CHANNEL 3/4 REMODULATOR SWITCH** lets you pick the channel on which your TV will receive the satellite and cable broadcast.
- 12 CABLE IN** connects your cable service line to your receiver to deliver standard analog cable programming.
- 13 TO PHONE JACK** connects your receiver to the phone network to enable instant pay-per-view services, like movies, sports or special events.

SPECIFICATIONS:

L-band Input

Input Frequency	950 to 2150 MHz
Input Impedance	75Ω
Input Level	-65 dBm to -25 dBm
Noise Figure	8 dB maximum
H/V Input Isolation	40 dBm
Demodulator	QPSK demodulator

Cable Input

Input Frequency	54 to 860 MHz
Input Impedance	75Ω
Input Level	0 dBm to +15 dBmV
Noise Figure @ 10 dBm input	<10 dBm

Video

Output Level	1 Vp-p into 75Ω
De-emphasis	525 line CCIR Rec. 405-1

Cable Video (Analog)

Frequency Response	+1.58 to -1.94 dB, 0.5 to 3.0 MHz +1.58 to -2.98 dB, @ 3.58 MHz
Differential Gain	8.0% p-p maximum
Differential Phase	8.0 deg p-p maximum
S/N	49 dB minimum @ 6 dBmV (unified weighing 100kHz to 4.2 MHz)

VHF Output

Impedance	75Ω
Channel	Ch. 3 or 4
Level, video	66 dBuV ±3 dB from VHF modulator
Audio	mono

Audio

Modes	Digital stereo, NTSC subcarrier; analog stereo
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Cable Audio (Analog)

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

Remote Control

Transmitter	Infrared (IR), UHF optional
Batteries	2 x AA type
Range	35 ft (IR) 150 ft (UHF)
Angle	Line-of-site (IR) None (UHF)

Physical Environment

Temperature	0° to 40°C ambient
Humidity	95% relative
Dimensions	17"W x 4"H x 13.5"D
Weight	18 lbs
Power Input	115V±10% AC;60Hz nominal; 50W maximum
UL	Listed
CSA	Certified



Broadband Communications Sector

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Features and functions subject to change without notice.

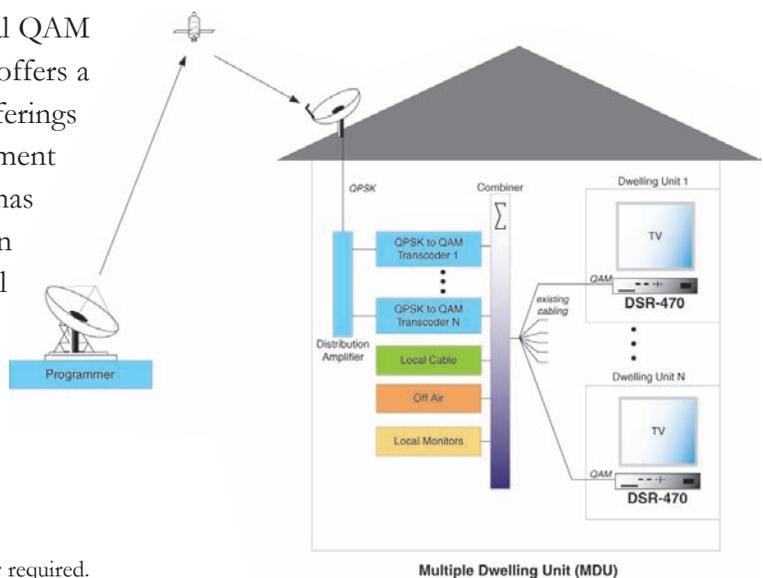
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Designed to help small cable systems to integrate digital satellite feeds with local analog service

The Motorola DSR-470 is a consumer receiver that allows multiple dwelling unit (MDU) owners who cannot readily upgrade to digital cable to offer digital programming to tenants with a unique satellite delivery method. Using in-place cable wiring and headend equipment, digital satellite signals can be delivered to an MDU complex where they can be converted from satellite-friendly QPSK modulation to cable-friendly QAM modulation*. When combined with analog cable signals, this "mini cable system" gives viewers instant access to over 200 channels of digital and analog programming over a single coaxial cable without hanging satellite dishes from the balconies of each unit.

To facilitate this type of MDU digital system, the Model DSR-470 accepts program signals, authorization and control commands like a satellite receiver, but is installed at the end of a coax. Equipped with both a digital QAM and analog cable tuner, the Motorola DSR-470 offers a wide range of viewing options - the combined offerings of analog cable and digital satellite - to the apartment or hotel room occupant. In addition, Motorola has developed a unified digital/analog on-screen display so that the viewer can seamlessly scan all available channels.

A typical MDU system using Motorola DSR470s is shown in the diagram below:



*Third party QPSK/QAM transcoder required.



- Seamless cable and satellite technologies integrated and delivered in a single digital entertainment receiver
- Integrated program guide for seamless transition between analog and digital channels
- Instant-pay-per-view for movies, sports and special events
- Dolby brand AC-3 Pro Logic surround sound
- Parental controls to block programming and limit access to underage viewers
- **Optional Accessories:**
Premium 4:1 remote control unit (receiver, TV, VCR/DVD and stereo)

DSR-470 DIGITAL ENTERTAINMENT RECEIVER SPECIFICATIONS

CABLE INPUT

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

DIGITAL PROCESSING

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

CABLE VIDEO (ANALOG)

Frequency Response.....	(+)1.58 to (-)1.94 dB, 0.5 to 3.0 MHz (+)1.58 to (-)2.98 dB, @ 3.58 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)

DIGICIPHER® II COMPOSITE VIDEO

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

VHF OUTPUT

Impedance.....	75 Ω
Channel.....	Channel 3 and 4
Level, Video.....	66 dBuV \pm 3 dB from VHF modulator
Audio.....	Mono, SAP (menu selected)

VIDEO

Output Level.....	1 V p-p into 75 Ω
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)
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CABLE AUDIO (ANALOG)

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

DIGICIPHER II AUDIO, ANALOG

Number of Stereo Outputs.....	2
Impedance.....	110 Ω maximum
Output Level.....	5.66 V p-p \pm 10% into 2k Ω load with 0 dBFS digital input
Frequency Response.....	1.0 DB p-p, 20 Hz to 20 kHz
THD.....	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

Number of Outputs.....	1
Impedance.....	75 Ω
Signal Level.....	0.5 p-p \pm 20% into 75 Ω load
Connector.....	RCA
Format.....	Dolby AC3 or PCM

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 \pm 20 ppm
Format.....	AMI encoded with 8% minimum transition density
Multiplex.....	MPEG-2 compatible
Signal Level.....	0.5 V p-p \pm 20% AC coupled into a 110 Ω
Connector.....	DB-9

MODEM REPORTBACK INTERFACE

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

IR REMOTE CONTROL

Operational Range.....	35 feet; \pm 22.5° from center (horizontal axis) \pm 13.0° from center (vertical axis)
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UHF REMOTE CONTROL

Operational Range.....	150 foot radius from unit
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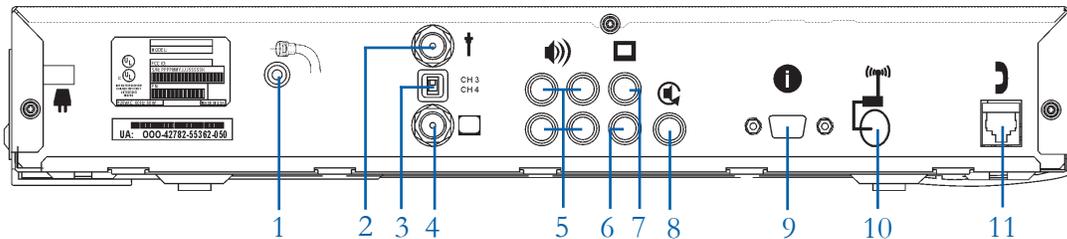
PHYSICAL/ENVIRONMENTAL

Temperature.....	0° - 40°C (ambient)
Humidity.....	95% relative
Dimensions.....	17"(W) x 4"(H) x 13.5"(D)
Weight.....	approx 11 lbs
Power Input.....	115V \pm 10% AC, 60 Hz (nominal), 25 W (maximum)
Regulatory Compliance.....	UL listed, CSA certified

OTHER

Remote.....	2 x AA batteries
Limited Warranty.....	One year

INPUTS/OUTPUTS



- | | | |
|--------------------------------|-----------------------------|-------------------------|
| 1..... Cable Input | 5..... Audio Outputs | 9..... Multimedia Port |
| 2..... Antenna Input | 6..... VCR Output | 10..... UHF Remote Port |
| 3..... Channel 3/4 Remodulator | 7..... TV Output | 11..... Phone Jack |
| 4..... VHF Output | 8..... Dolby Digital Output | |

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