



December 7, 2007

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W.  
Washington, D.C. 20554

**RE: Ex Parte Presentation, CS Docket No. 97-80**

Dear Ms. Dortch:

We write on behalf of the Association of Public Television Stations (APTS), a non-profit organization whose membership comprises the licensees of nearly all of the nation's CPB-qualified noncommercial educational television stations. Public television stations are industry leaders in leveraging their digital capabilities to offer a diverse range of services. We ask that the Commission, in its consideration of standards for the development of two-way "Plug & Play" devices, take action that will ensure that wide array of digital offerings by Public Television is available to all television households.

In January 2005, APTS and the Public Broadcasting Service (PBS) signed an agreement with the National Cable and Telecommunications Association that paved the way for carriage of the high-definition, multicast and datacast digital signals of public television stations by larger cable providers. Recently, APTS and PBS reached a similar agreement with the American Cable Association, which represents more than 1,000 of the nation's smaller cable companies. We hope that these agreements will set the stage for future innovation in the delivery of Public Television's diverse services, and we request that the Commission approve a platform for two-way devices that will ensure that *all* of the content that we provide through cable under our agreement—via linear broadcast, on-demand or some future applications—will be available to *all* cable customers. It is our understanding that the OpenCable Application Platform ("OpenCable") is a platform that will ensure this will happen.

In addition, Public Television is fully committed to the Advanced Common Application Platform (ACAP), a comprehensive standard developed by the Advanced Television Systems Committee (ATSC) to support interactive television applications. For example, PBS and *The NewsHour with Jim Lehrer* have been supporting ATSC field trials of ACAP that are utilizing content provided by the Online NewsHour team. We urge the Commission to adopt a standard that is fully compatible with ACAP, and we understand that ATSC and CableLabs are collaborating to ensure seamless compatibility between ACAP and OpenCable. This should ease the way for broadcasters, including public broadcasters, as they delve into the possibilities of interactive television.

**The Association of  
Public Television Stations**

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We encourage the Commission to be mindful of these considerations. Please feel free to contact the undersigned if you have any questions.

Sincerely,



John M. Lawson  
President and CEO



Lonna Thompson  
Senior Vice President and General Counsel

cc: Chairman Kevin J. Martin  
Michelle Carey  
Commissioner Michael J. Copps  
Rick Chessen  
Commissioner Jonathan S. Adelstein  
Rudy Brioché  
Commissioner Robert M. McDowell  
Cristina Chou Pauzé  
Commissioner Deborah Taylor Tate  
Amy Blankenship