

January 25, 2008

**VIA ECFS**

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

**Re: Iowa Network Services, Inc.  
Notice of Oral Ex Parte Presentation  
CS Docket No. 97-80**

Dear Ms. Dortch:

Today, the undersigned representative of Iowa Network Services, Inc. (“INS”) met with Brendan Murray and David Konczal of the Policy Division of the Media Bureau to discuss existing waivers of Section 76.1204(a)(1) granted to multichannel video programming distributors (“MVPDs”) that obtain their video programming through a central distribution network connected to a headend operated by INS. Those MVPDs include Bernard Telephone Company, Inc., Dumont Telephone Company, Farmers’ and Business Mens’ Telephone Company, Heart of Iowa Communications Cooperative, Kalona Cooperative Telephone Co., Local Internet Service Company, Mahaska Communications Group, LLC, Radcliffe Telephone Company, South Slope Cooperative Telephone Company, West Liberty Telephone Company, and Winnebago Cooperative Telephone Association (together, the “INS MVPDs”).

The oral presentation gave FCC staff an overview of the conditional access technologies currently deployed by the INS MVPDs, and specifically, those offered by Nagravision and Widevine. INS also updated FCC staff regarding the progress towards developing an open conditional access standard for IPTV, and informed the FCC that it appeared that such a standard was at least two years away. INS also relayed its concern that downloadable conditional access solutions (“DCAS”), like that offered by Widevine, and the IPTV solution offered by Nagravision, may not comply with Section 76.1204(a)(1). Although the solutions may comply with the requirement to have separable security, it did not appear that they met the “common reliance” requirement in the FCC’s rules. INS also discussed the comments filed by AT&T in the above-referenced docket that suggested that its IPTV conditional access system complied with the FCC’s integration ban, notwithstanding that the question of common reliance remained open. INS also discussed Verizon’s waiver, and its position that DCAS would not comply with

the FCC's integration ban unless it was, among other things, open and universally interoperable in order to meet the FCC's common reliance requirement. Finally, INS noted that the INS MPVDs may need to request an extension of time for the existing waivers if the FCC did not issue a decision soon regarding NTCA's pending petition for clarification or waiver for MVPDs deploying IPTV distribution systems.

Pursuant to Section 1.1206(b)(2) of the Commission's rules, an electronic copy of this letter and a handout given at the meeting is being filed for inclusion in the above-referenced dockets. Please direct any questions regarding this filing to the undersigned.

Respectfully submitted,



Tony S. Lee

cc: Brendan Murray  
David Konczal

## **INFORMAL AGENDA DISCUSSION TOPICS**

- I.** Overview of INS MVPDs
- II.** IPTV System Providers
  - A.** Nagravision Solution
  - B.** IPTV Standards Working Group
- III.** Downloadable Conditional Access Solution
  - A.** Widevine Solution
- IV.** Verizon Waiver
- V.** AT&T's Position on IPTV
- VI.** Practical Issues
  - A.** Common Reliance & Separable Security
  - B.** Extension of Waiver
  - C.** New Systems
  - D.** Combined or Individual Petitions