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October 24, 2008

Chairman
Christopher T. Rice
AT&T

VIA ELECTRONIC FILING

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

First Vice Chairman
Nick Adamo
Cisco Systems

Second Vice Chairman
Mark Wegleitner
Verizon

Re: CS Docket No. 97-80
Ex Parte Presentation

Dear Ms. Dortch:

Treasurer
Harald Braun
Harris Stratex Networks

The Alliance for Telecommunication Industry Solutions (“ATIS”), on behalf of its IP-based Separable Security Incubator (“AISP.5-ISSI”), is writing to update the Federal Communications Commission (“Commission”) on the progress ATIS has made toward developing industry-wide solutions for IP-based separable security in the emerging IPTV market that are consistent the Commission’s objectives in the above-referenced docket. In a recent press release, ATIS announced that its AISP.5-ISSI has validated that its VueKey™ solution meets the FCC objective of IP-based separable security as set forth in CS Docket No. 97-80.¹

President & Chief
Executive Officer
Susan M. Miller
ATIS

ATIS is a global standards development and technical planning organization that is committed to providing leadership for, and the rapid development and promotion of, worldwide technical and operations standards for information, entertainment and communications technologies using a pragmatic, flexible and open approach. Industry professionals from all segments of the communications industry actively participate in ATIS’ 22 open industry committees and forums.

Vice President of
Finance & Operations
William J. Klein
ATIS

The AISP.5-ISSI is a forum comprised of telecommunications service providers, consumer electronic, and security industry professionals involved in various aspects of the IPTV market. AISP.5-ISSI was established by ATIS in June 2007 to fast-track the creation of two distinct solutions for IP-based separable security in the emerging IPTV market. AISP.5-ISSI is comprised of 11-ATIS member companies including Alcatel Lucent, CableLabs®, CCAD, Cisco, Hitachi Telecom (USA) Inc., LG Electronics, Nagravision SA, Sony, Verimatrix, Inc., Verizon Communications Inc. Widevine Technologies, Inc.

¹ “ATIS Validates VueKey™ Solution to Meet FCC Directive for Separable Security for IPTV,” ATIS News Release, October 14, 2008.

Since its inception, AISP.5-ISSI has made significant progress toward the development of two industry created solutions which would comply with the FCC's integration ban requirement that "unaffiliated manufacturer, retailers, and other vendors to commercially market host devices while allowing [television] operators to maintain control over their systems." The two solutions being developed by AISP.5-ISSI include:

- 1) technical enhancements to the existing CableCARD™ specification that would enable IP flows which are agnostic to the network technology of the service or network provider; and
- 2) creation of a target solution for downloadable security functionality that would eliminate the need for the physical device for hosting the security function.

The two solutions are being developed using an open and consensus-based approach and will be platform and technology neutral. The goal of the first solutions is to create a physically separable security component for IPTV that is backwards compatible to the existing unidirectional and multi-stream, CableCARD™ specifications. The downloadable security target solution will assess alternative approaches and recommend a viable "path forward" for the IPTV industry.

The following list highlights AISP.5-ISSI's key activities and accomplishments to date.

KEY DELIVERABLES

September 2007	Produced detailed interface diagrams that describe the components and functions for achieving ATIS' physically separable security solution for IPTV, which is known as the VueKey™ solution. These diagrams depict how various access network modems can interface with the Host.
October 2007	Performed a Command and Control impact analysis on the existing CableCard™ and created flow charts describing the possible customer actions or scenarios that must be accommodated by VueKey™.
December 2007	Began drafting the VueKey™ specification that describes the VueKey™ Interface Architecture, Interface Connections, and the IP network flows.
July 2008	Completed the development of a physical interface of the VueKey™ solution. The VueKey™ solution is a card designed to connect to the Host devices (TV, DVR or set top box) through a Personal Computer Memory Card International Association (PCMCIA) interface. The card would unbundle the security function from the service provider set-top box allowing consumers to purchase commercially available host devices from retailers to provide the security.

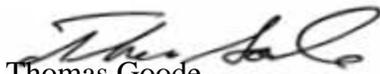
August 2008 Successfully conducted an interoperability test event, that brought together manufacturers who agreed to cross test their devices on the networks/systems of other vendors. The interoperability test event demonstrated the viability of the VueKey™ solution to work with various manufacturers' and vendors' devices.

December 2008 Expected completion of a viability assessment for the best approach to implement downloadable security functionality.

The development of the technology-agnostic ISSI specification will help facilitate the development of a common solution for video providers and support future IP-based video delivery solutions. AISP.5-ISSI plans to share the technical solutions developed with ATIS IPTV Interoperability Forum (IIF) and other appropriate standards organizations to further standardization work in the IPTV area.

If there are any questions regarding this matter, or you would like additional information about the work of AISP.5-ISSI, please do not hesitate to contact the undersigned.

Sincerely,



Thomas Goode
General Counsel

CC:

Nancy Murphy, Associate Bureau Chief, FCC Media Bureau
MaryBeth Murphy, Chief, Policy Division, FCC Media Bureau
Steven Broekaert, Senior Deputy Chief, Policy Division, FCC Media Bureau
Brendan Murray, Attorney Advisor, FCC Media Bureau