

10 Algonquin Drive
Huntington Station, NY 11746
4 October 2009

Dear Sirs,

The filing by Cablevision Systems, your proceeding number 09-0168, has recently been brought to my attention. As a long time Cablevision subscriber, I am voicing my opposition to the granting of the requested waiver.

In the first paragraph, Cablevision asserts that such waiver will have “virtually no negative effect on customers...” Since I am a customer, I can say with some authority that such a waiver would have a negative effect on my service, requiring that I both rent and find space for a set top box for each of my sets that currently work with QAM tuners.

In the following paragraph, Cablevision states that encryption of basic services would, “benefit subscribers by allowing Cablevision to offer them an easier and more efficient way to activate and terminate service”. However, they spend the subsequent paragraphs detailing the number of “truck rolls” they will save, the costs of such operations, the fuel savings, and the potential to reduce cable theft and piracy. Perhaps I’m missing it, but these seem like benefits to Cablevision, rather than to customers; maybe there’s a section in the application detailing the cost savings and benefits we as customers may expect, but it’s not readily apparent in my reading of the application.

Cablevision then describes the savings to be accrued - again, to them, not to the customer - by not having to roll a truck for a cable disconnect. Unless they anticipate leaving their set-top box on premises for disconnected customers, or anticipate that, having failed to pay their monthly bill, disconnected customers are going to make returning the box to their local Cablevision store a priority, they will have to roll that truck to try to reclaim their box.

Finally, Cablevision indicates that encrypting basic cable services, “will provide programming content owners with greater assurance of protection for their high-value digital and HD content made available to over-the-air broadcast stations”. I fail to comprehend how encrypting content that is freely available over the air protects any content owner’s rights.

I would like to believe that the FCC rules, including the section 78.630(a) Cablevision would like waived, were put in place to protect content owners, content transmitters, and content consumers, and should not be waived except under the most unusual circumstances. I hope you will not consider Cablevision’s application to fall into that category, and that you will continue to require that Cablevision adhere to all applicable rules.

Sincerely,
Vincent E. Fasano