

I respectfully submit this opposition to the Cablevision Systems Corporation's ("Cablevision's") Petition for Waiver of Section 76.630(a) of the Commission's Rules. Allowing Cablevision to encrypt its basic programming tier would mean taking away a vital low-cost option for consumers -the ability to receive basic programming without a set-top box or CableCARD rental. A waiver would also render inoperable many QAM tuner devices purchased by subscribers.

Cablevision's Petition does not present the particularized "strong need" that Section 76.630(a) requires, and does not mention any significant levels of theft of service as the reason for this waiver. As noted by the FCC in previous filings (such as that for Centennial Puerto Rico Cable TV Corp. Petition for Waiver) the waiver should not be used to help facilitate connections/disconnections for the operator.

Furthermore, in the case of local broadcast channels, which are already transmitted over the air, and carried along digitally on cable lines, there should be no reason to further encrypt these channels. This waiver would explicitly grant them to encrypt these, where it does not represent a theft of service in any way, nor a cost incurred to the cable company.

Because it does not meet the rule's criteria, and because it would deny consumers an option that the Commission has long considered vital, the Petition should be denied.