

**Before the
Federal Communications Commission
Washington, D.C. 20554**

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| In the Matter of |) | |
| TiVo Inc.'s |) | |
| Petition for Waiver of the |) | |
| IEEE-1394 Output Requirement |) | CSR-8252-Z |
| |) | |
| Implementation of Section 304 of the |) | |
| Telecommunications Act of 1996 |) | CS Docket No. 97-80 |

COMMENTS OF INTEL CORPORATION

Pursuant to the Notice of Media Bureau Action, dated February 2, 2010, in the above-referenced dockets, Intel Corporation provides these comments in support of the request of TiVo Inc. for waiver of the requirement to incorporate an IEEE 1394 output on operator-supplied set-top boxes, pursuant to Commission Rule 76.640(b)(4). As the Commission is aware, Intel also has filed a Petition for Waiver of this requirement, in Docket No. CSR-8229-Z. The reasons supporting the TiVo petition reflect the same policy benefits and concerns as those cited by Intel in its waiver request. Therefore, Intel sees no reason why both petitions should not be granted forthwith.

Intel concurs with TiVo that IP outputs will fulfill the goals that the Commission sought to promote when it first adopted Rule 76.640(b)(4). Connecting set-top boxes to an IP-based home network can better realize consumers' reasonable and customary expectations with respect to home and personal recording and networking of video programming (including programming encoded with technological protections that control copying or retransmission), and promote interoperability with a variety of consumer electronics and personal computing products. TiVo Request at 7. Although the cable and consumer electronics industries jointly urged the Commission to adopt the

Rule with all best intentions, the 1394 protocol (the only viable technology option at the time of the Rule) has failed to win marketplace approval from consumers or device manufacturers for home networking applications. TiVo Request at 3. The world since has migrated to IP-based networking. These changed circumstances warrant the grant of exceptions that will better promote the policy goals underlying the Rule.

Intel further agrees with TiVo that the costs of implementing 1394 outputs have impeded competition based on both price and features that consumers value. TiVo Request at 6. As Intel noted in its Petition, the added expense required for a fully-functional 1394 connection can make it cost-prohibitive for STB makers to adopt more innovative technologies such as those enabled by the Intel system-on-a-chip processors. Intel Petition at 5-6. Therefore, granting the requested waivers to TiVo as well as to Intel should result in better consumer experiences at more competitive prices.

TiVo correctly observes that waiving the Rule will have no impact on those device manufacturers that do wish to incorporate 1394 outputs in their navigation devices. TiVo Request at 9. Facilitating IP-based networking of set-top boxes will neither harm any parties nor effect any change to the Rule. The waivers will simply enable exceptions that are more than justified by the resulting benefits to consumers and manufacturers.

Respectfully submitted,

/s/ SDG

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