

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554**

In the Matter of	)	
	)	
Intel Corporation	)	CSR-8229-Z
	)	
Motorola, Inc.	)	CSR-8251-Z
	)	
TiVo, Inc.	)	CSR-8252-Z
	)	
Requests for Waiver of Section 76.640(b)(4)(ii) of the Commission's Rules	)	
	)	
Implementation of Section 304 of the Telecommunications Act of 1996; Commercial Availability of Navigation Devices	)	CS Docket No. 97-80

**TEXAS INSTRUMENTS PETITION FOR CLARIFICATION**

Texas Instruments Incorporated (“Texas Instruments”) is pleased to observe that the Media Bureau has not waived Section 76.640(b)(4)(iii) of the Commission’s rules and has required that IP-based cable operator-provided set-top box interfaces output video in a format that can be received by third-party devices. The Media Bureau recently granted the petitions by Intel (“Intel”), Motorola, Inc. (“Motorola”) and TiVo, Inc. (“TiVo”) for limited interim waivers of the Commission’s IEEE-1394 interface requirement (the “*76.640(b)(4)(ii) Limited Waiver Grant*”).<sup>1</sup> The Commission’s *76.640(b)(4)(ii) Limited Waiver Grant* makes no mention of waiving Section 76.640(b)(4)(iii). The Commission should continue to enforce Section 76.640(b)(iii) because Section 76.640(b)(4)(iii) sets forth the existing home networking functionality requirements for cable operator-provided set-top boxes. If cable operators are

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<sup>1</sup> *Intel Corporation, Motorola, Inc., TiVo, Inc. Requests for Waiver of Section 76.640(b)(4)(ii) of the Commission’s Rules*, Memorandum Opinion and Order, CSR-8229-Z, CSR-8251-Z, CSR-8252-Z, DA 10-1094 (Jun. 18, 2010).

allowed to provide any IP-based networking port in lieu of IEEE-1394 without also being required to meet the home networking functionality requirements of Section 76.640(b)(4)(iii), consumers will be forced to take a giant step backwards.

Section 76.640(b)(iii) requires that cable operator-provided high definition set-top boxes meet the following home networking specifications:

- Comply with ANSI/SCTE 26 2001 (formerly DVS 194): “Home Digital Network Interface Specification with Copy Protection,” with transmission of bit-mapped graphics optional.
- Support the CEA-931-A: “Remote Control Command Pass-through Standard for Home Networking” pass through control commands: tune function, mute function, and restore volume function.
- Support the power control commands – power on, power off, and status inquiry – defined in A/VC Digital Interface Command Set General Specification Version 4.0 (as referenced in ANSI/SCTE 26 2001 (formerly DVS 194): “Home Digital Network Interface Specification with Copy Protection”).<sup>2</sup>

The Commission, in its *Plug and Play Order*, initially imposed (without objection) the functionality requirements of Section 76.640(b)(4)(iii) in order to “set a baseline for connectivity.”<sup>3</sup>

The Media Bureau, in the *76.640(b)(4)(ii) Limited Waiver Grant*, concluded that “IP connections will serve the same purposes that the IEEE 1394 interface requirement is intended to

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<sup>2</sup> See § 76.640(b)(4)(iii).

<sup>3</sup> See *Implementation of Section 304 of the Telecommunications Act of 1996; Commercial Availability of Navigation Devices; Compatibility Between Cable Systems and Consumer Electronics Equipment*, Second Report and Order, 18 FCC Rcd. 20885, 20897 (2003).

achieve – encouraging connectivity between cable operator-leased set-top boxes and retail consumer electronics devices and computers.”<sup>4</sup> This conclusion is expressly based on the assertion by the petitioners that sought the waiver that “IP connectors offer equivalent functionality to IEEE 1394 interfaces.”<sup>5</sup> For that assertion to be true, set-top box IP connectors must output video in a format that can be received by third-party devices (which is expressly required in the *76.640(b)(4)(ii) Limited Waiver Grant*)<sup>6</sup> and must satisfy the minimum standards set forth in Section 76.640(b)(4)(iii). Otherwise consumers connecting an IP-connector-equipped retail-purchased device to the cable operator-provided set-top box via an IP connection have no guarantee that they will actually be able to pass through video or remote control commands so that they can use their own devices.

Intel makes broad claims about what “IP connectors” will do for consumer home networking.<sup>7</sup> For example, Intel claims that through grant of its waiver request “MSOs will be able to offer consumers HD content, a range of functionality, and, through the IP-based output, home networking and digital recording, at an affordable price.”<sup>8</sup> If that is the case, then there should be no objection to the Commission reminding cable operators that, at a minimum, cable

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<sup>4</sup> *76.640(b)(4)(ii) Limited Waiver Grant* at ¶ 1.

<sup>5</sup> *Id.* at ¶ 5.

<sup>6</sup> *Id.* at ¶ 8.

<sup>7</sup> Of course, IEEE-1394 is also an “IP connector” because IEEE-1394 is capable of transmitting using Internet protocol.

<sup>8</sup> Intel Corporation Request for Waiver of Section 76.640(b)(4)(ii) of the Commission’s Rules, CSR-8229-Z, at 15. Similarly, Motorola observes that its “IP-based connectors also are suitable for supporting recording functionality” and TiVo states that cable operator distribution of a TiVo set-top box with an IP connector in lieu of IEEE-1394 will result in expanded set-top box functionality. Motorola, Inc. Request for Waiver of Section 76.640(b)(4)(ii) of the Commission’s Rules, at 7 n.20; TiVo, Inc. Request for Waiver of Section 76.640(b)(4)(ii) of the Commission’s Rules, at i.

MSOs using these IP connectors must satisfy the existing home networking requirements of Section 76.640(b)(4)(iii).

In summary, the Commission should continue to enforce the standards of Section 76.640(b)(4)(iii) of the Commission's rules, consistent with its statement in the *76.640(b)(4)(ii) Limited Waiver Grant* that cable-operator provided set-top boxes that use an IP-based connector in lieu of an IEEE-1394 interface must output video in a format that can be received by third-party devices and must continue to comply with the rest of the Commission's rules.<sup>9</sup>

Respectfully submitted,



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<sup>9</sup> *76.640(b)(4)(ii) Limited Waiver Grant* at ¶¶ 8, 12.

## CERTIFICATE OF SERVICE

I hereby certify that on this 16<sup>th</sup> day of July, 2010, I served copies of the foregoing  
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