

**BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554**

In the Matter of

Proceeding 00-67: Compatibility Between Cable Systems and Consumer Electronics Equipment

Proceeding 10-91: Video Device Competition Implementation of section 304 of Telecommunications Act of 1996 Commercial Availability of Navigation Devices Compatibility between Cable system and consumer electronics equipment.

Proceeding 97-80: Implementation of Section 304 of the Telecommunications Act of 1996 Commercial Availability of Navigation

- I support and urge the FCC to adopt the TiVo proposal, submitted to the FCC on June 14, 2010, to mandate the use of an IP backchannel to access SDV channels. The IP based mandated solution could serve as a step toward a next-generation gateway solution for the home.

- I need to comment on the fact that the current Cisco STA1520 Switched Digital Video Tuning Adapter (“SDV-TA”) has a 2-Tuner limitation. By design or perhaps a lack of design and forethought, and in a rush to get the Tuning Adapter to consumers, only the 2-Tuner TiVo was considered in development. The Cisco SDV-TA cannot accommodate all 3 Tuners in the ARRIS/Moxi 3-Tuner HD DVR design. Hence, by attaching the Cisco SDV-TA, it disables the 3rd Tuner in the Moxi HD DVR. I do not believe this issue has been addressed in any comments by any organization or individual, at least not that I could find.

- So that the FCC can fully examine the potential extent of the Cisco SDV-TA 2-tuner limitation. The FCC should require Cable Providers to disclose their current number of subscribers in each market that utilizes SDV within a Cisco-based system that uses the Cisco SDV-TA, to determine the potential impact.

- The FCC should also require the Cable Providers to submit their 2-5yr plans for SDV implementation and again supply the FCC with their anticipated number of potentially impacted subscribers in each market that utilizes SDV within a Cisco-based system that uses the Cisco SDV-TA.

- I desire to advocate that “if” the FCC determines that Cable Provider supplied Tuning Adapters are still to be the only and preferred method to access SDV programming, That the Tuning Adapter requirements must be mandated to specify that they support the same number of tuners that the Multi-Stream CableCARDS (M-Cards) are capable of supporting.

- I must comment on the fact that ARRIS in their own filing to the FCC dated June 14, 2010, responding to Proceeding Number: 97-80 , 00-67 and 10-91 made no mention of the fact that the current Cisco SDV-TA limited the ARRIS/Moxi HD DVR and it's customers to the use and availability of only two (2) of the 3 Tuners. This fact was simply omitted when ARRIS stated "Once the Tuning Adapters are placed in service, they work in providing Moxi customers with access to SDV channels and give them the experience and functionality they expect from the UDCP."

- From Moxi's own website: <http://moxi.com/us/faq.html> "FAQ # 18. Does Moxi Support Switched Digital Video?" "Yes, Moxi supports Switched Digital Video. You can get a Switched Digital Video adapter from your cable service provider. You should know that if you own a 3-tuner Moxi HD DVR, some cable service providers do not support three tuners with their adapters, and you will only have access to two tuners. Contact your cable service provider to find out whether you're in one of those areas."

- All ARRIS/Moxi customers and potential customers on a cable system utilizing a Cisco headend using a Cisco SDV-TA to access SDV programming would lose the capability of the 3rd Tuner in the ARRIS/Moxi 3-Tuner HD DVR design.

- ARRIS in its own filing stated the following.
<http://fjallfoss.fcc.gov/ecfs/comment/view?id=6015649573>

- ARRIS Quote: "About five percent of Moxi DVRs are deployed with Tuning Adapters." (That percentage will most likely grow significantly as more Cable Operators begin deploying SDV.)
- ARRIS Quote: "Once the Tuning Adapters are placed in service, they work in providing Moxi customers with access to SDV channels and give them the experience and functionality they expect from the UDCP." (ARRIS made this statement to the FCC, Knowing full well the Cisco SDV-TA did not support 3-Tuners, and as many more Cable Providers, utilizing Cisco headends, start to implement SDV in markets that do not currently use SDV, Moxi customers will not have "the experience and functionality they expect from the UDCP.")

- Please Note, that once ARRIS submitted their filing to the FCC dated June 14, 2010, Both Comcast and Cisco filed a comment quoting ARRIS. In an attempt to further justify that the current Tuning Adapters in place perform to customers' expectations and are sufficient so that no further action is necessary. That supposition simply cannot be made.

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○ According to the Comcast Corporation filing in 97-80 dated 06/28/2010 <http://fjallfoss.fcc.gov/ecfs/comment/view?id=6015658403> "Likewise, many commenters agree that the Tuning Adapter ("TA") is a proven and effective way for UDCP customers to access SDV channels. For example, ARRIS, the manufacturer of the Moxi DVR, notes that TAs "work in providing Moxi customers with access to SDV channels and give them the experience and functionality they expect from the UDCP." "

○ According to the Cisco Systems filing in 97-80 dated 06/28/2010 <http://fjallfoss.fcc.gov/ecfs/comment/view?id=6015658427> "Notably, ARRIS Group ("ARRIS"), which manufactures the Moxi HD digital video recorder ("DVR") for retail sale, agrees that the tuning adapter is an effective solution. ARRIS states that "once the Tuning Adapters are placed in service, they work in providing Moxi customers with access to SDV channels and give them the experience and functionality they expect from the UDCP."

• Also of note, is the upcoming release of the Ceton InfiniTV 4-Tuner PC Card. This new consumer choice for building a Home Theater PC (HTPC), will also be limited by the Cisco SDV-TA to the use and availability of only two (2) of the four (4) Tuners. Quoted from the Ceton website: <http://www.cetonecorp.com/products.php>

○ "The Ceton InfiniTV 4 is the world's first multi-tuner PC card for watching digital cable TV on the PC, including support for premium cable channels. It enables Media Center PCs to play or record up to four (4) live channels of HDTV at once, and stream live HD channels or recordings to multiple HDTVs throughout the home, all from a single cable connection and a single CableCARD™. Replace your cable set-top boxes and their costly monthly rental fees and enjoy premium cable TV throughout the home, all from a single PC. With the Ceton InfiniTV 4 your Media Center PC becomes a complete entertainment platform for all your media, including premium cable TV."

○ "Supports Switched Digital Video: As cable providers move to Switched Digital Video (SDV) technology, rest assured that your Ceton InfiniTV 4 supports SDV Tuning Adapters as well." (But again, no mention of the Cisco SDV-TA 2 Tuner limitation.)

• I support and urge the FCC to allow and enforce that Unidirectional Digital Cable Ready Products ("UDCP") customers be able to self-install their CableCARDS if the Cable Provider allows its subscribers to self-install operator-leased set-top boxes.

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Respectfully
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