

Seth D. Greenstein
Attorney at Law
202-204-3514
sgreenstein@constantinecannon.com

August 5, 2010

VIA ELECTRONIC FILING

Ms. Marlene Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: Notice of Ex Parte Presentation, MB Docket No. 10-91, CS Docket No. 97-80, and PP Docket No. 00-67

Dear Ms. Dortch:

This letter is submitted pursuant to 47 C.F.R. § 1.1206.

On August 4, 2010, the undersigned met with Millie Kerr, Confidential Assistant and Staff Attorney in the Office of Commissioner Meredith Attwell Baker. The purpose of the meeting was to review the Comments of the Digital Transmission Licensing Administrator LLC and the comments of others concerning DTCP content protection in the above-referenced proceedings. Specifically, the discussion summarized the nature and operation of DTCP, and its potential applicability to provide effective content protection for content output from an AllVid adapter to devices connected to a digital home network.

It was explained that DTLA's Content Participants and numerous content owners require in their licenses that DTCP be applied at digital networked outputs of navigation devices. Through a combination of technological and legal protections and licensing conditions, DTCP ensures that conditional access content delivered via an MVPD will remain protected, in accordance with the instructions of the content owner and the Commission's Encoding Rules, seamlessly on all display and storage devices on the home network. As a result, it is unnecessary for an MVPD to exercise control over content displayed or copied by a consumer on devices competitively available from entities other than the MVPDs. Moreover, because the use of DTCP is required by license, and is specified in the DLNA guidelines, DTCP-IP need not be specifically mandated by Commission regulation; that is the case under current regulations.

DTCP protection is flexible enough to accommodate current MVPD business models, and can be supplemented to facilitate additional protections and future business models. For example, it was noted that the DTCP Specification since 2001 provided a means for MVPD video rental services, and that DTCP will be able to enable services offered pursuant to the May 7, 2010 Order waiving for limited purposes the Commission's prohibition on the use of selectable output control. DTCP currently interoperates with numerous protection systems and DRM technologies, and can work compatibly with future systems.

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With respect to paragraph 28 of the Notice of Inquiry in the above-referenced proceedings, it was explained that DTLA through contractors would provide a unique certificate per AllVid adapter, in the same way as it typically provides a unique certificate today per set top box. This certificate would be used for authentication of DTCP-enabled devices on the home network “downstream” from the AllVid adapter. Authentication of the AllVid adapter “upstream” to the MVPD would be the responsibility of the MVPD’s conditional access system in the adapter.

In accordance with Section 1.1206 of the Federal Communications Commission rules, this letter is being provided to your office. A copy of this notice has been delivered to the person listed below.

Respectfully submitted,

/s/ Seth D. Greenstein

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cc: Millie Kerr