

August 8, 2010

Federal Communication Commission

**RE: Implementation of Section 304 of the Telecommunications Act of 1996;  
Commercial Availability of Navigation Devices**

I am a practicing electrical engineer with experience in the design of telecommunications equipment and integrated circuits. I own two TiVo DVRs which use CableCARDs. My cable service recently introduced switched digital video service in my area which required a tuning adaptor be attached to each of my DVRs to view certain channels.

In my experience as a consumer, the tuning adaptor is not a good solution. Having two set top boxes that must work together is a clunky solution that reduces the overall reliability of the system and gives cable company provided equipment a competitive advantage. The use of an IP (internet) channel for communication with the cable system head-end will be a much cleaner, more reliable solution that is better for consumers. Requiring consumers have an internet connection to view switched channels seems to be a more reasonable requirement than having to add the current type tuning adaptor. It also opens up the possibility to solve some of the current limitations of the CableCARD system.

While CableCARD is not perfect, it is a fielded, practical solution that is critically important to maintaining competition in the DVR market. While I understand the motivations for finding a next generation system to replace CableCARD, it will be a number of years for that type of solution to be available to consumers. The addition of an IP channel to the current CableCARD system can be fielded much more quickly and is a reasonable requirement for cable companies that choose to use a switched digital architecture.

Sincerely,  
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