

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

In the Matter of)	
)	
Video Device Competition)	MB Docket No. 10-91
)	
Implementation of Section 304 of the Telecommunications Act of 1996)	
)	
Commercial Availability of Navigation Devices)	CS Docket No. 97-80
)	
Compatibility Between Cable Systems and Consumer Electronics Equipment)	PP Docket No. 00-67
)	

REPLY COMMENTS OF MONTGOMERY COUNTY, MARYLAND

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SUMMARY

Montgomery County filed opening comments urging the Commission to bring immediate relief to consumers by mandating a sale option for existing video devices, which today can only be leased from multi-channel video programming distributors (“MVPDs”). In these Reply Comments, the County reiterates this call for Commission action, and disputes suggestions that a retail market has already developed, or alternatively that one will not develop due to lack of consumer interest.

The commenters in the opening round of this proceeding have raised numerous technical, legal, First Amendment, and practical issues and disputes that must be resolved before proceeding with an AllVid solution. If there is a consensus among the commenters, it is that the Commission’s timetable for AllVid implementation is far too optimistic in light of these complexities. This consensus confirms the County’s initial concerns, and reinforces the need for interim measures to bring immediate relief to consumers.

The Commission should mandate that MVPDs offer subscribers the opportunity to purchase their existing video devices, in addition to any lease option, and require MVPDs to disclose specific information to ensure that subscribers understand their options.

The County also joins supporters of public, educational and governmental (“PEG”) access programming in urging the Commission to ensure that PEG programming is treated the same as commercial channel programming in on-screen and on-line programming guides.

Finally, the County urges the Commission to take an active role in ensuring that all functionalities and standards are adequately developed and tested in the technical discussions and ultimate creation of the AllVid solution, including closed captioning, emergency alerts,

secondary audio, video description, and parental controls, and in determining the demarcation of technical functionalities and features between MVPD networks and client devices.

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REPLY COMMENTS OF MONTGOMERY COUNTY, MARYLAND

Montgomery County, Maryland (the “County”), submits these reply comments to reiterate its view that the Commission should take immediate action to mandate a sale option for existing devices supplied by multi-channel video programming distributors (“MVPDs”), as an interim step for promoting competition in the retail market for set-top video devices. Such an interim step is essential to protect consumers while the complex technical and legal issues involved in the “AllVid” solution are resolved over the next several years through this proceeding and the inevitable subsequent rulemakings. The County also supports the comments of supporters of public, educational and governmental (“PEG”) access, urging the Commission to ensure that PEG channel programming information is treated the same as commercial channel programming information in on-screen and on-line programming guides. Finally, the Commission should take a proactive, consumer-focused role in developing the AllVid solution to ensure that standards for closed captioning, emergency alerts, secondary audio, video

description, parental controls and demarcation of responsibility for technical functionalities and features between MVPD networks and consumer-side devices are included in any federal regulations or technical standards.

I. THE COMMENTS TO DATE CONFIRM THE COUNTY’S CONCERNS THAT THE ALLVID PROCESS WILL BE LENGTHY, AND CONTINUED RELIANCE ON INDUSTRY NEGOTIATIONS WILL ONLY LEAD TO FURTHER DELAY.

In its opening comments, the County had expressed concern that the issues raised by the Commission in this proceeding were complex and would require many years to resolve.¹ The County’s concerns have been confirmed by the filings of numerous other commenters. A broad range of technical, security, copyright, and competition issues, concerns and disputes are evident in the filed comments.² Various MVPDs have also challenged the scope of the Commission’s authority under Section 629 of the Communications Act to impose an AllVid solution, and have raised First and Fifth Amendment issues.³

¹ Comments of Montgomery County, Maryland (“Montgomery County Comments”), at 5. Unless otherwise specified, all citations to comments herein are to comments filed on July 13, 2010, in response to *In the Matter of Video Device Competition; Implementation of Section 304 of the Telecommunications Act of 1996; Commercial Availability of Navigation Devices; Compatibility Between Cable Systems and Consumer Electronics Equipment*, Notice of Inquiry, 25 FCC Rcd 4275 (2010) (“NOI”).

² See, e.g., Comments of the National Cable and Telecommunications Association (“NCTA Comments”); Comments of the Motion Picture Association of America; Comments of the Telecommunications Industry Association (“TIA Comments”); Comments of the National Association of Telecommunications Officers and Advisors, the New America Foundation’s Open Technology Initiative, Anne Arundel County, Maryland, Illinois NATOA, the Southeast Association of Telecommunications Officers and Advisors, the National Capital Association of Telecommunications Officers and Advisors, the Washington Association of Telecommunications Officers and Advisors, the Minnesota Association of Community Telecommunications Administrators, and the States of California and Nevada Chapter of NATOA (“NATOA Comments”).

³ See, e.g., Verizon Comments at 21-24; Time Warner Cable Comments at 10-12; AT&T Comments at 43-66; Cablevision Comments at 25-29; NCTA Comments at 47-52.

Given the complex array of issues and concerns presented, it should come as no surprise that many commenters, particularly MVPDs, believe that the Commission's December 2012 timeframe is too ambitious.⁴ Indeed, one commenter, citing past industry experience with the development of DOCSIS and digital television standards, implied it could take a decade or more to resolve all the issues posed by the AllVid proposal.⁵

Many of the same commenters who are pessimistic about the Commission's proposed timeline nonetheless claim that the best course of action is for the Commission to let the "market" resolve these issues.⁶ The County urges the Commission to recognize the difficulty inherent in relying on parties to voluntarily negotiate solutions when they have a financial incentive to maintain the status quo, and therefore urges the Commission to take an active role in driving these diverse parties to fulfill the mandate of Section 629 for the benefit of consumers. Reliance on voluntary market-driven solutions for thirteen years has yet to produce a computer retail market for video devices. If the market alone were capable of producing a competitive retail market, the Commission would not have had to initiate this proceeding. Moreover, the comments reveal that the industry participants have reached an impasse on several important matters that warrant Commission action.⁷

⁴ Commenters have described the December 2012 timeline variously as "entirely unrealistic" (AT&T Comments at 3); "wildly unrealistic" (Verizon Comments at 20); "unrealistic" (TIA Comments at 8); "not realistic" (Beyond Broadband Comments at 17); "not reasonably achievable" (DirecTV Comments at 18, n. 55); "wildly optimistic" (Time Warner Cable Comments at 16); and "very optimistic" (Cisco Comments at 34) .

⁵ Beyond Broadband Comments at 10-11.

⁶ AT&T Comments at 2; Verizon at 1-2; Time Warner Cable Comments at 2; DirecTV Comments at iv-v.

⁷ See, e.g., AT&T Comments at 7-9 (discussing "impasse" between MVPDs and consumer electronics manufacturers over control of the "user interface" - an issue raised by numerous commenters).

While the County applauds the Commission for setting a goal of shepherding these diverse parties and interests to a December 2012 result, it is difficult to be optimistic when there is such strong skepticism about the feasibility of the timeline, particularly among the MVPDs that will be front and center in its implementation. Thus, the County realistically expects that it will take many more years to implement the AllVid solution, and urges the Commission to act accordingly.⁸

II. MANDATING AN INTERIM SALE OPTION IS ESSENTIAL AS A FORM OF IMMEDIATE RELIEF TO CONSUMERS TO FURTHER THE GOALS OF SECTION 629.

Considering that a realistic timeline will have consumers waiting years for the AllVid solution, it is absolutely essential that the Commission adopt interim measures to further the principal goal of Section 629, that is, the establishment of a competitive retail market in video devices.⁹ The County disputes the suggestions of some commenters that a robust retail market for video devices used to access MVPD services has already developed, or alternatively, that one will not develop due to lack of consumer interest.

A. A Retail Market For Video Devices Has Not Developed.

As the Commission has unanimously recognized, Section 629's promise of a retail market for video devices has not been fulfilled.¹⁰ The Commissioners' separate statements on

⁸ Moreover, the County notes that implementation of previous Commission orders was delayed by litigation. *See, e.g., General Instr. Corp. v. FCC*, 213 F.3d 724 (D.C. Cir. 2000).

⁹ Even under the Commission's optimistic timeline, if rules are developed by 2012 and not stayed through litigation, it will likely take manufacturers an additional eighteen to twenty-four months to bring retail devices to market. Thus, it will be another four to five years for the AllVid proceeding, *i.e., nineteen to twenty years since the enactment of Section 629*, to fulfill the mandate of Section 629.

¹⁰ NOI, 25 FCC Rcd at 4305-4306; *see also*, Statement of Chairman Julius Genachowski, 25 FCC Rcd at 4294; Statement of Commissioner Michael J. Copps, 25 FCC Rcd at 4296; Statement of Commissioner Robert M. McDowell, 25 FCC Rcd at 4298; Statement of

the NOI contradict the claim made by some commenters that the mere availability of devices that lack comparable features is evidence of the competitive retail market mandated by Section 629.¹¹

The County disagrees with commenters who state that a competitive retail market for video devices used to access MVPD services has already developed. For example, NCTA states:

Consumers may also purchase CableCARD-enabled devices at retail or use one of numerous retail over-the-top video services, none of which require a set-top box from the cable operator.¹² (citation omitted)

While CableCARD devices are available, this is not evidence that Congress's goal in Section 629 has been fulfilled. To the contrary, the evidence in this proceeding shows that consumers mostly do lease their set-top boxes from their MVPD today – whether it is the incumbent cable operator, or a satellite provider, or a telephone company. They still lease their set-top boxes to access MVPD services because there are no adequate substitute devices available at retail.

CableCARD devices have not been popular with consumers because they generally lack the equivalent functionality of the set-top boxes that are only available for lease from MVPDs.

CableCARD devices are not capable of accessing interactive two-way features. Thus, the electronic program guide cannot be accessed, DVR and show search functions cannot be accessed, and these devices cannot be used to select On-Demand features or to order Pay-Per-View services. In addition, when channel bonding technology is used, certain channels cannot be viewed. Moreover, in Montgomery County, Verizon has just notified consumers that on or

Commissioner Mignon L. Clyburn, 25 FCC Rcd at 4300; Statement of Commissioner Meredith A. Baker, 25 FCC Rcd at 4301.

¹¹ Likewise, the availability of over-the-Internet video services (Netflix, Hulu, and the like) and the availability of devices at retail used to access these non-MVPD services cannot substitute for the goal of Section 629, which is to develop a retail market in video devices used to access services offered by MVPDs.

¹² NCTA Comments at 7; *see also* Verizon Comments at 1; Time Warner Cable Comments at 3-4; TIA Comments at 3-4.

after September 15, 2010, certain CableCARD devices may “lose the ability *to tune to most FiOS TV channels* after [certain planned] network maintenance is complete.”¹³

B. A Retail Market For Video Devices Will Develop If Consumers Are Offered Comparable Devices.

The County also disagrees that the evidence before the Commission supports drawing the conclusion that a retail market for video devices will not develop because consumers rationally prefer leasing.¹⁴ That proposition has never been truly tested in a market where video devices with equivalent functionality are offered both for sale and for lease.¹⁵ CableCARD devices are not functionally equivalent to current MVPD-provided devices. The fact that a significant number of consumers opt to purchase these functionally inferior devices, as well as the significant number of consumers who purchase TiVo devices instead of MVPD DVRs, suggests that there is substantial consumer demand for competitive retail devices that would be exercised if comparable devices were offered at retail. Similarly, DirecTV on the one hand states that the satellite set-top box market is already competitive and available at retail yet customers prefer to lease, and on the other hand, spends a lot of time discussing why third-party-supplied video devices offered for sale at retail are inadequate substitutes for the ones made available for lease due almost entirely to differences in functionality.¹⁶

The County acknowledges that leasing may well be a rational consumer response today - where imperfect video device options and imperfect information about those options are

¹³ Notice to Verizon Subscribers (August 12, 2010), *attached as Exhibit A*.

¹⁴ *See, e.g.*, MICHAEL G. BAUMANN & JOHN M. GALE, ECONOMIC ANALYSIS OF THE REGULATION OF MVPD NAVIGATION DEVICES, attached to *ex parte* Letter from Neal M. Goldberg, Vice President and General Counsel, National Cable & Telecommunications Association, to Marlene H. Dortch, Federal Communications Commission (filed July 19, 2010); Time Warner Cable Comments, pp. 7-9.

¹⁵ *See* Sony Electronics Comments at 25-26; TiVo Comments at 4-5.

¹⁶ DirecTV Comments at 4, 24-25;

available. But as the County recently pointed out in reply comments filed in the Commission's CableCARD proceeding, it is also undeniable that consumers often pay a lot more than the value of the equipment over time in order to lease video devices from MVPDs, and may find it more economical to purchase their devices if given the option.¹⁷ So long as consumers do not have the opportunity to make a real choice to purchase an equivalent device to the one they lease, it is irrelevant that there may be lots of video devices in the marketplace, and claims that consumers prefer to lease are meaningless.

C. Absent a Commission-Mandated Sale Option, a Retail Market Will Not Develop for Years to Come.

As discussed above, today there does not exist a retail market for video devices that are equivalent in functionality to the video devices offered only for lease by MVPDs, and the Commission is facing years of work ahead to resolve the complex issues related to developing and implementing its AllVid solution. In these circumstances, the County repeats its call for the Commission to take an elegantly simple step now toward the development of a retail market for existing video devices – mandate a sale option. The many benefits of implementing a sale option were set out in the County's opening comments, and need not be repeated here.¹⁸

The County notes that a sale option is consistent with two of NCTA's proposed new "Consumer Principles:"¹⁹

¹⁷ *In the Matter of Implementation of Section 304 of the Telecommunications Act of 1996; Commercial Availability of Navigation Devices; Compatibility Between Cable Systems and Consumer Electronics Equipment*, Fourth Further Notice of Proposed Rulemaking, CS Docket 97-80, PP Docket 00-67, FCC 10-61 (rel. April 21, 2010), Reply Comments of Montgomery County (filed June 28, 2010) at 2-4, and Exhibit A thereto.

¹⁸ Montgomery County Comments at 5-10.

¹⁹ NCTA Comments at 2-6, 14, 21-24, Exhibit A.

- Consumers should have the option to purchase video devices at retail that can access their multichannel provider’s video services without a set-top box supplied by that provider.
- Consumers should also have the option to purchase video devices at retail that can access any multichannel provider’s video services through an interface solution offered by that provider.

In the County’s view, these principles are generally consistent with the County’s request that the Commission mandate a sale option for existing video devices, *i.e.* existing set-top boxes which often are only available for lease from the MVPD to subscribers.²⁰ In fact, there is no need for NCTA members to wait for Commission action. They can put their commitment into action by voluntarily introducing a sale option immediately while the Commission takes the steps necessary to implement a formal sale mandate.

D. The Sale Option Mandated By The Commission Should Be Accompanied By Other Rules to Ensure It Is Fully And Fairly Implemented By MVPDs.

In addition to calling for a sale option for existing video devices now available only for lease by MVPDs, the County supports proposals made by other commenters for more MVPD disclosures to consumers concerning leasing costs, and available alternatives. Specifically, the County agrees with the suggestion that MVPDs be required to:

- (1) disclose the retail price of leased equipment alongside the monthly rental fee,
- (2) disclose to customers on each bill how much they have paid in rental fees for that equipment to date, and
- (3) expressly inform customers that they have the option of purchasing a competitive device at retail.²¹

²⁰ NCTA appears to be drawing a distinction between “video devices” and “set-top boxes” in the first of the two quoted “Consumer Principles.” However, the purpose of this distinction is unclear given that the Commission’s view is that set top boxes *are* video devices. *See* NOI, 25 FCC Rcd at 4275, n. 2.

²¹ Comments of Public Knowledge and New America Foundation at 10.

Likewise, the County agrees with suggestions that MVPDs should be required to make consumers aware of other important information including: (1) not just the monthly lease price for the MVPD's video device, but also "the estimated average cumulative cost of such a device over the duration of a service contract or other time period;" (2) that the consumer "will not own the device at the end of that period;" (3) the amount (which can be in the hundreds of dollars) that the consumer "will pay if the device is damaged, lost, or stolen;" and (4) a list, similar to the list MVPDs provide for compatible cable modems, that "would illustrate to consumers their options for third-party navigation devices."²²

Although the above-mentioned proposals were made with implementation of the AllVid solution in mind, the County believes it would be valuable to introduce them now along with the sale option for existing video devices that the County proposes. That way, their effectiveness can be tested and refined along with the sale option, as progress is made on an AllVid solution.

The County also supports the suggestion by TiVo that the Commission hold off on evaluating the need to phase out support for CableCARD-reliant devices "until after a successor regime has an established track record of providing real consumer choice."²³ There is certainly no need to adopt plans for phasing out support for existing consumer-owned devices before alternatives have even been developed.

Finally, the County also notes that any AllVid solution or immediate sale mandate should ensure that any necessary downloadable upgrades to devices are made available to consumers who own retail-supplied devices. The majority of cable operators now encrypt all but their broadcast channels and PEG access channels. Therefore, these MVPD upgrades are necessary to receive the majority of cable service, and the cost of providing these upgrades should be included

²² Free Press Comments at 7-8.

²³ TiVo Comments at 17-18.

in the cost of the service and made available on a non-discriminatory basis to all devices connected to the MVPD system.

III. THE COMMISSION SHOULD ENSURE THAT PUBLIC, EDUCATIONAL, AND GOVERNMENTAL ACCESS PROGRAMMING IS TREATED THE SAME AS COMMERCIAL CHANNEL PROGRAMMING IN ON-SCREEN AND ONLINE PROGRAMMING GUIDES.

There is a contentious industry debate evident in the comments concerning control over the “user interface,” which involves such issues as programming guide information, and copyright.²⁴ Supporters of PEG access programming, however, raise an important issue that should not be lost in this wider debate, that is, PEG channel program listings are not consistently included in on-screen and online programming guides along with the commercial channel program listings, even though PEG channels provide vital public information, particularly in emergencies.²⁵ PEG channels are also the last bastion of truly local programming. For example, the daily schedule for the County’s government access channel, “County Cable Montgomery,” is made up almost exclusively of local programming content.²⁶ By contrast, the daily schedules of local commercial channels list very little local programming content outside of local news shows in the mornings and evenings.²⁷ Furthermore, a recent academic study of the content of local news

²⁴ See, e.g., AT&T Comments at 8-9, 51-57; Free Press Comments at 11-15.

²⁵ NATOA Comments at 2-7; Comments of the Fairfax Cable Access Corporation (“FCAC Comments”), at 1-3.

²⁶ See the daily programming schedule on the CCM website.
<http://www.montgomerycountymd.gov/ccmtmpl.asp?url=/content/cableOffice/CCM/schedule.asp>

²⁷ See, e.g., ABC, <http://www.abc7dc.com/onabc7/?d=8/10/2010>; CBS, <http://www.wusa9.com/life/programming/local/default.aspx>; FOX, http://www.myfoxdc.com/subindex/entertainment/tv_listings; NBC, <http://www.nbcwashington.com/station/tv-listings/tv-listings-wash.html>.

shows in the Los Angeles area showed that even local news programs spend very little time on local news stories.²⁸

But if MVPDs do not carry the PEG channel program listings on their on-screen and online programming guides, it is difficult for the public to become aware of these valuable local resources. This is because, with the development of advanced digital programming guides and the large selection of available channels, it is more and more common for the public to review program descriptions on the electronic program guide for interesting programming, rather than sequentially viewing each individual channel. If the PEG channel is always listed as “local programming” or something equally generic, rather than by showing the names of the actual programs, viewers will not know what is on the PEG channel. Nor will they be able to easily determine the name of the program they are watching, find the program again the next time it is on, or be able to record the program by setting their DVR. These are huge disadvantages for PEG channels.

For these reasons, the County strongly supports the call for a Commission rule requiring equal treatment for PEG program listings in on-screen and online programming guides.²⁹ This is a matter of public importance that should be addressed by Commission action as soon as possible.

²⁸ MARTIN KAPLAN, PH.D. & MATTHEW HALE, PH.D., USC ANNENBERG SCHOOL, LOCAL TV NEWS IN THE LOS ANGELES MEDIA MARKET: ARE STATIONS SERVING THE PUBLIC INTEREST?, March 2010 (available at <http://www.learcenter.org/pdf/LANews2010.pdf>) (last accessed August 11, 2010).

²⁹ NATOA Comments at 7-10; FCAC Comments at 3.

IV. WHEN DEVELOPING THE “ALLVID” SOLUTION, THE COMMISSION SHOULD FOCUS ON PUBLIC INTEREST ENHANCEMENTS AND DEMARCATING FUNCTIONALITIES, NOT ON PARTICULAR TECHNOLOGIES.

In its initial comments, the County noted that the DTV transition revealed a number of technical problems with viewer enhancements such as closed captioning, which strongly suggests that an AllVid solution will face similar complications. The County urged the Commission to draw on the considerable knowledge gained from its DTV transition experience in addressing the issues raised in this NOI.³⁰

A review of the opening round comments in this proceeding confirms that the Commission must take the lead on addressing these issues. Viewer enhancements that are of critical importance to certain segments of the public are largely ignored by the commenters in this proceeding. With very few exceptions,³¹ industry players do not even identify vital public interest functionalities, such as closed captioning, emergency alerts, secondary audio, video description, and parental controls, as items that need to be addressed in developing the AllVid solution. The lack of attention by industry participants to the need for the AllVid solution to address standards for these specialized functionalities is troubling, although perhaps not unexpected.

Recent experience with the DTV transition should make it clear that considerable work may be required to develop or adapt existing standards for the AllVid solution, and the sooner

³⁰ Montgomery County Comments at 9.

³¹ Those commenters that do make mention of some of these functionalities, do so only in passing (DirecTV Comments at 16; NCTA Comments at iii; Verizon Comments at 19; AT&T Comments at 30; Google Comments at 13), or express confidence that existing standards will be readily adaptable (Comments of DISH TV and EchoStar at 9-10; Digital Living Network Alliance Comments at 9-10; Sony Comments at 14, 20-21).

the work gets started the better.³² In developing the AllVid solution, there is a vital role for the Commission to play in ensuring that standards are also developed, tested and implemented for functionalities that are important to segments of the population that are not as well represented in these proceedings as the industry, but depend on these specialized functions and features to enjoy video programming. Thus, the Commission, knowing the types of problems that have arisen, cannot, and should not, allow technical debates to be directed by the priorities of the industry participants alone.

More generally, several commenters have urged the Commission to give guidance as to which of a panoply of technical functionalities and features (*e.g.*, security, tuning, interactive guides, cache storage) can or must be controlled by the MVPD's AllVid adapter and network and which ones should be left for the devices on the client side of the demarcation.³³ The County supports this as a logical approach to resolving impasses and disputes, avoiding the pitfalls that have arisen in the past from choosing specific technologies.

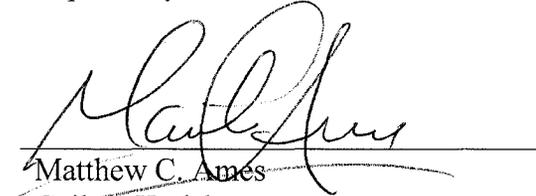
³² For example, Acting Chairman Michael J. Copps, upon the establishment of the Technical Working Group on Captioning and Video Description in May 2009, stated: "Unfortunately, like much of the DTV transition, we are playing catch-up and cannot address all of these issues before the transition date. But we can start, and we can commit ourselves to working together—government, industry, and consumers — to address these problems as quickly as we can." Statement of Acting Chairman Copps (May 1, 2009), accompanying *FCC Announces Establishment Of Technical Working Group To Study Digital Closed Captioning And Video Description Issues, Appointment Of Members, Agenda For First Meeting*, Public Notice, DA 09-995, (rel. May 1, 2009). *See also*, notes of the meetings of the Technical Working Group on Captioning and Video Description prepared by the Northern Virginia Resource Center for Deaf and Hard of Hearing Persons in 2009, <http://www.nvrc.org/contentd96b.html?page=31877§ion=5> (last accessed August 9, 2010).

³³ *See, e.g.*, TiVo Comments at 7-11; Comments of CEA and CERC at 7-14; Motorola Comments at 28-30.

CONCLUSION

Montgomery County urges the Commission: (1) to act now to adopt interim rules to promote a competitive video device market by introducing a sale option for existing video devices, and related disclosure rules; (2) to adopt a rule to require equal treatment for PEG channel program listings in on-screen and online programming guides; and (3) to take a proactive role, as this proceeding and subsequent related rulemakings move forward, to ensure that the AllVid solution focuses on demarcating critical functionalities, and addresses development and testing of standards for important viewer enhancements such as closed captioning, emergency alerts, secondary audio, video description, and parental controls.

Respectfully submitted,



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August 12, 2010

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**Action May Be Required Regarding
Accessing Your FiOS® TV Service
Using a CableCARD™ Compatible Device**



Peter Augustine
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August 12, 2010

Dear Verizon Customer:

As part of our ongoing dedication to provide excellent service, Verizon continues to enhance and maintain its network to deliver you premium service. We are writing to inform you that Verizon will be performing maintenance on its FiOS TV network on or after September 15, 2010, which may impact your ability to use your CableCARD™ compatible devices to access Verizon's FiOS TV service.

It is important to read this notice in its entirety to avoid any potential service interruptions.

Certain older televisions and other consumer electronics devices may fail to properly communicate with the CableCARD™ and lose the ability to tune to most FiOS TV channels after the network maintenance is complete. Please contact Verizon to discuss alternative equipment options to avoid any potential service interruption. We can be reached Monday through Friday from 8am-6pm at 888-329-5568.

Also, CableCARD™ compatible TiVo® used to access FiOS TV should not be impacted but you should ensure that your TiVo® box has recently connected to the TiVo® service.

Thank you for choosing Verizon as your entertainment provider.

Sincerely,

Verizon