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Re: Waivers for 47 CFR 76.1204(a)(1)... filing relevant to proceedings 97-80, 00-67 and 10-91.

As a consumer who makes use of the technology I oppose waivers being granted. The integration ban is a great idea but it doesn't go far enough.

I have four digital cable related devices. The Scientific Atlanta 4240HDC is a clear result of the integration ban, although its cablecard slot is closed by a special screw that is further covered by some kind of liquid plastic seal: clearly Cox wants that cablecard to be with the box for the life of both. But the sticker on the cover clearly says there is an M-card inside. And it's odd: *despite the supposed limitations of M-cards this device supports Cox's video on demand and does not require a tuning adapter! Oddly, it tunes the SDV channels – with no external adapter.* Perhaps it complies with the letter of the integration ban, but not the spirit.

I have a Scientific Atlanta explorer 8300 series PVR. It is a model that was released before the integration ban.

The 4240HDC and 8300 series devices are indistinguishable from each other save for the PVR functions. They have the same unimaginative user interface with graphics quality reminiscent of a mid-1980's computer: a Commodore 64.

These devices were installed in my home in approximately 15 minutes from start to end of the visit.

Then we get to the TiVo Series 3 HD unit. It counts as two digital cable devices because of the M-card inside it. There is a Cisco SDV adapter connected to it so it can receive the considerable number of channels that are provided over SDV.

The Cisco SDV adapter is always warm to the touch. It must always be on so it's yet another inefficient device consuming standby power – and I pay for that twice because the A/C is working a little bit harder to remove that heat from the room. Although the purpose for the device is clear, it has little in the way of information on its front panel. Simply a green light. If it's solid it's probably working, but no guarantee. If it's flashing you should count the flashes to know what the error condition is.

I'm not sure who you would report this to, however. In my experience the vast majority of customer-facing employees at Cox have no idea what a tuning adapter or cable card is.

Whereas their integrated and non-integrated devices were installed in fifteen minutes, getting my TiVo hooked up took a total of about three hours spread over two visits. First visit – the order had been

written wrong since the order taker had no idea what a tuning adapter was, so it wasn't on the paperwork. The guy was a contractor (gets paid per successful visit) and he tried to tell me I didn't need the SDV adapter. When I stood my ground he made a token attempt at installing the cable card, said he couldn't get anyone on the phone to help him with it – and left. It took three phone calls and some emails back and forth to get Cox to send someone qualified, with the right internal access to the provisioning system, to arrive with an SDV adapter and card.

That setup process is insane.

What's more, SDV is broken right "out of the box." Tuning requests from SDV devices must be tagged as either "human-initiated" or "software speculative." TiVo has this thing called suggestions – the value of the device and its service is largely the addition of "Suggested" content to your block of recorded content. However, since Cox Phoenix seems to deny "speculative" tuning requests on ALL channels, not just SDV-delivered ones – suggestions stop working immediately when this hardware is installed.

TiVo is considering swapping my box (although that's not likely to help, from what I read online)... and if they DO swap my box I start from zero at getting another cablecard and SDV tuning adapter because the ones that I have are married to the existing TiVo unit. It would mean more time off from work and more begging Cox to come change it out.

In short: you fight them tooth and nail to get you the right equipment to view their programming. If their back-office staff was trained and empowered to use their authorization system correctly, self-install would be not only plausible but easy. It's not rocket-science to plug this stuff in.

I support and urge the FCC to mandate and enforce that retail consumer Unidirectional Digital Cable Ready Product ("UDCRP") customers be able to self-install their CableCARDs if the Cable Provider allows its subscribers to self-install operator-leased set-top boxes.

TiVo submitted a proposal 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. It would remove the need for tuning adapters entirely.

Lastly, 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 don't have this problem (yet) but if were to switch to a Windows Media Center configuration using Ceton's InfiniTV M-card host, on Cox Phoenix I would require TWO of the Cisco TA's to receive the four streams the InfiniTV can decrypt simultaneously.

Thanks

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