

October 1, 2010

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

Re: CS Docket No. 97-80, PP Docket No. 00-67.

Dear Ms. Dortch:

On September 30, 2010, Jim Coltharp, Chief Policy Advisor for FCC & Regulatory Policy at Comcast Corporation, Charlie Kennamer, Vice President, Engineering Policy and Industry Affairs at Comcast Cable, Jay Kreiling, Vice President, Video Services at Comcast Cable, and the undersigned met separately with the following Commission staff to discuss issues in the Commission's CableCARD Further Notice of Proposed Rulemaking ("FNPRM"): (1) Paul de Sa, Chief, Office of Strategic Planning and Policy Analysis; (2) Brad Gillen and Krista Witanowski, Legal Advisors to Commissioner Baker, and Rafi Martina, an intern in Commissioner Baker's office; (3) Eloise Gore, Legal Advisor to Commissioner Clyburn; and (4) Joshua Cinelli, Legal Advisor to Commissioner Copps.

At these meetings, Comcast described the substantial efforts it has undertaken in support of CableCARDs. Comcast also reiterated its strong support for the proposal in the FNPRM to exempt one-way navigation devices from the integration ban, as well as its general support for several other proposals in the FNPRM.

Comcast also indicated its general support for a proposal to provide a credit to customers who take a service bundle from the cable operator and elect to use a retail CableCARD device rather than equipment that an operator may provide as part of the bundle. Comcast stated that credit should be equivalent to the amount that an operator charges for, or allocates to, equipment in the service bundle. Comcast noted that it already utilizes a method for allocating the cost of equipment included in a service bundle under the existing rate regulation regime, and this method has been approved by two state taxing authorities and disclosed to local franchising authorities. Comcast urged that the Commission allow Comcast to use that methodology, rather than an entirely new allocation formula, to calculate the amount of the credit. Comcast further requested that the Commission avoid an allocation formula that would result in a credit that exceeds the amount that an operator charges for, or allocates

to, equipment. In response to questions about making the credit as transparent as possible to customers, Comcast offers to report the amount of the credit to the Commission and include information about the credit on its web site and in annual rate cards.

Comcast also noted its strong support for giving cable operators the flexibility to include an IP interface of their choice on HD set-top boxes and further noted that it could support a requirement that the IP interface output video in a recordable format. However, Comcast urged that the Commission avoid mandating the use of remote control commands on the IP interface. As has been explained previously in the record, no standards currently exist to enable such commands on an IP interface. Comcast noted that work is proceeding in DLNA in this area, but did not know when these inter-industry efforts would be completed. Comcast expressed concern that, in the absence of remote control command standards for IP interfaces, cable operators might be required to continue including the 1394 connector on their HD set-top boxes, notwithstanding the fact that 1394 is largely unused today and, as the Commission recognized in its *Intel Waiver Order*, has been overtaken in the marketplace by IP solutions. Comcast also noted that, to the extent the Commission is examining possible ways to enable networking of content to other devices in the home, those issues should be addressed in the context of the AllVid proceeding, which involves all MVPDs, rather than by adopting cable-specific rules here.

In addition, Comcast urged that the Commission exempt HD DTAs from any interface requirement that might be adopted in this proceeding. Comcast explained that the HD DTA is a low-cost, limited-capability device whose primary purpose is to give customers a no-cost or low-cost way to access linear HD content on their HDTVs. Comcast noted that IP connectors would add unnecessary costs to the device and thereby impede Comcast's efforts to keep the device as low cost as possible. The Commission expressed similar concerns in waiving the 1394 requirement in its *Cable One Waiver Order*.

With respect to self-installation issues, Comcast noted that it already gives customers the option to self-install their CableCARDS in certain markets and is working toward making that option available across its footprint. In response to questions about CableCARD billing transparency, Comcast noted that it generally provides CableCARDS to customers at no additional charge and expressed concerns that including CableCARD-related pricing information on customer bills was unnecessary in such circumstances and would likely engender customer confusion (*i.e.*, the typical customer will not know what a CableCARD is and will wonder why Comcast is bothering to reference the CableCARD when there is no extra charge for it). To the extent the Commission nonetheless believes this information should be disclosed to customers, Comcast urges that the Commission allow such information to be disclosed via the annual rate card or on Comcast's web site.

Marlene H. Dortch
October 1, 2010
Page 3

Kindly direct any questions regarding this matter to my attention.

Sincerely,

/s/ Jonathan Friedman
Jonathan Friedman
Counsel for Comcast Corporation

Attachment

cc: Paul de Sa
Brad Gillen
Krista Witanowski
Eloise Gore
Josh Cinelli