



Public Knowledge

October 6, 2010

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th St. SW
Washington, DC 20554

RE: Notice of Ex Parte presentation in CS Docket No. 97-80, PP Docket No. 00-67, MB Docket 10-91

Dear Ms. Dortch:

Today, Harold Feld and John Bergmayer of Public Knowledge (PK) met with Paul de Sa, Chief of the Office of Strategic Planning & Policy Analysis; Jonathan Baker, Chief Economist; and Douglas Sicker, Chief Technologist.

PK explained that CableCARD is of continuing importance—even under an ambitious AllVid timetable, CableCARD will continue to be the only way for cable customers to use unaffiliated, retail devices for some time. During that time, a proper set of CableCARD rules could encourage new entry by CE companies responding to consumer demand for next-generation video devices, while at the same time reducing the cost of entry-level devices. By contrast, if the Commission issues a set of rules that focuses only on support issues (however important they are) without also addressing the structural problems that have kept third-party CableCARD devices in a niche, it will freeze the status quo.

PK also discussed AllVid. PK recognizes the complexity of the issue of technological standardization but believes the Commission is competent to address them. PK stressed that the AllVid gateway should be kept simple, and that an approach more similar to DLNA than to OCAP (middleware) or RVU (remote user interface) would better promote a competitive retail market for video devices and allow for edge innovation.

Sincerely,

/s/ John Bergmayer
Staff Attorney
Public Knowledge

CC:

William Lake
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