

October 7, 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 October 6, 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 had a conference call with the following Media Bureau staff to discuss issues in the Commission's CableCARD Further Notice of Proposed Rulemaking ("FNPRM"): Mary Beth Murphy, Nancy Murphy, Michelle Carey, Steve Broeckert, Alison Neplokh, Brendan Murray, Jeff Newman, and Lyle Elder.

Comcast reiterated its request that the Commission exempt HD DTAs from any interface requirement that might be adopted in this proceeding. *See* Comcast Comments at 31-32; NCTA Comments at 35. 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 one-way HD content on their HDTVs. The HD DTA would be a particularly cost-effective option for secondary HDTVs in the home, which are becoming increasingly commonplace. The HD DTA would include two interfaces -- HDMI for output to an HDTV, and RF for output to analog TVs. The RF interface also could be used to output video to a standalone DVR for recording.

Comcast noted that IP connectors would add unnecessary costs to the HD DTA 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*, where it noted that "regardless of the cost of the 1394 requirement, we believe that the additional cost would be inconsistent with the purpose of this grant, *i.e.*, to provide a low-cost HD box for consumers." *Cable One Waiver Order* ¶ 16 n.42. Comcast further emphasized that the HD DTA would not support bidirectional capabilities, so it would not be a suitable device for the networking of content to other devices in the home.

Marlene H. Dortch

October 7, 2010

Page 2

In response to a specific question asked during the conference call, Comcast explained that the HD DTA would not be capable of accessing SDV channels. The HD DTA would only access one-way services, consistent with the Commission's guidance regarding low-cost, limited-capability devices. To the extent a customer utilizing leased equipment wanted SDV channels available with his or her level of service, the customer would use a two-way set-top box. Comcast noted that, in light of this option, there would be no need to develop a separate, and more expensive, alternative that involves pairing the HD DTA with a Tuning Adapter.

Kindly direct any questions regarding this matter to my attention.

Sincerely,

/s/ Jonathan Friedman

Jonathan Friedman

Counsel for Comcast Corporation

cc: Mary Beth Murphy  
Nancy Murphy  
Michelle Carey  
Steve Broeckaert  
Alison Neplokh  
Brendan Murray  
Jeff Newman  
Lyle Elder