

October 11, 2010

VIA ECFS AND ELECTRONIC MAIL

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

Re: 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
MB Docket No. 10-91; CS Docket No. 97-80
PP Docket No. 00-67

Dear Ms. Dortch:

On October 8, 2010, Joel Wiginton, Vice President and Senior Counsel, Government & Industry Affairs, and Jim Morgan, Director and Counsel, Government & Industry Affairs, for Sony Electronics Inc. (“SEL”), met with Paul de Sa, Chief, and Douglas C. Sicker, Chief Technologist, of the Commission’s Office of Strategic Planning and Policy Analysis, to discuss the “AllVid” proposal set forth in the *Notice of Inquiry* in the above-referenced proceedings.

In this meeting, the SEL representatives discussed procedural matters and reiterated arguments already reflected in Comments and Reply Comments submitted by SEL in these proceedings. Specifically, the SEL representatives underscored the following points:

1. The Commission must act on the AllVid proposal. The time has come to implement Section 629 as intended by Congress and to realize the consumer benefits of a competitive navigation device market. Private initiatives and the ongoing development of Internet-delivered video services do not change the fact that MVPD services will remain the primary mechanism for video delivery for the foreseeable future.

2. For the AllVid proposal to succeed, it must allow device manufacturers to differentiate their products in ways that are meaningful to consumers. In practice, and among other things, this requirement means that manufacturers must be permitted to offer unique, device-specific user interfaces. Remote user interface technologies, whereby devices reproduce a uniform user experience dictated by the service provider, can supplement, but should not preclude or replace, device-specific user interface functionality.

