

November 9, 2010

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

**Re: Notice of *Ex Parte* Presentation: MB Docket No. 10-91; CS Docket No. 97-80; PP Docket No. 00-67. *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***

Dear Ms. Dortch:

This is to notify you that on November 8, 2010, Jeffrey Campbell, Senior Director, Technology and Trade Policy, Cisco Systems, Inc. (“Cisco”) and the undersigned, counsel to Cisco, met with William Lake, Michelle Carey, Nancy Murphy, Alison Neplokh, Steven Broeckaert, Brendan Murray, Lyle Elder, and Jeffrey Neumann of the Media Bureau.

The purpose of this meeting was to discuss Cisco’s comments and reply comments filed in response to the April 21, 2010 notice of inquiry in the above-referenced dockets (the “AllVid NOI”), and a handout describing the major arguments in these filings was provided to the participants (copy attached).

This letter is filed pursuant to Section 1.1206 of the rules of the Federal Communications Commission. Please direct any questions to the undersigned.

WILKINSON ) BARKER ) KNAUER ) LLP

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Respectfully submitted,

WILKINSON BARKER KNAUER, LLP

By:           /s/ Natalie G. Roisman          

Natalie G. Roisman

*Counsel to Cisco Systems, Inc.*

Attachment

cc: William Lake  
Michelle Carey  
Nancy Murphy  
Alison Neplokh  
Steven Broeckaert  
Brendan Murray  
Lyle Elder  
Jeffrey Neumann

**Cisco Systems, Inc.**  
**FCC Media Bureau Meeting – November 8, 2010**  
**AllVid (MB Docket No. 10-91)**

**I. Achieving AllVid as it is proposed in the NOI is not technically feasible within the timeframe proposed in the NOI**

- The lengthy timeframe needed to develop AllVid risks rendering it immediately obsolete

**II. AllVid is unnecessary in light of the rapidly evolving marketplace, and its adoption would hinder innovation**

- The video delivery and STB marketplaces are entering a new era of innovation
  - OTT devices allow consumers to access video from a variety of online services and sources
  - Innovation in leased STBs includes increased ability to access Internet content
  - Surges in home networking promise to merge video, data, and voice networks into a single, accessible network (Cisco Next Generation IP Video Platform)
- FCC should facilitate further innovation, rather than mandate technology
  - In a vibrant, dynamic technology and business environment, no one can accurately predict technology and business model “winners”
  - Regulation would lock in a particular technology, rather than allowing multiple models to evolve in competition with each other to serve differing consumer needs; AllVid would arbitrarily favor device-based, edge functionality over network-based, cloud functionality and would require many consumers to pay for features they rarely or never use

**III. If AllVid is adopted, gateway capabilities should not be limited; proposed limitations would increase consumer costs and stifle innovation that could benefit retail smart video devices**

- FCC should permit deployment of enhanced AllVid gateways with capabilities to connect and manage multiple services (voice, data, video, wireless)
  - Limiting AllVid functionality would require consumers to purchase or rent AllVid devices and buy new high-capacity routers, broadband modems, cabling, and other networking equipment, whereas a single home gateway device that combines adapters/modems and other hardware could be half as expensive
  - Enhanced functionality would: simplify consumer access to multiple service providers and facilitate switching among providers; enable the FCC to apply the same rules to all MVPDs; create greater efficiencies than separate, redundant networks; and facilitate powerful cross-service applications
  - There should be no “common reliance” concerns in the AllVid context

**IV. Other considerations if the Commission adopts AllVid**

- Preserve flexibility to maximize chances of success
  - Refrain from dictating form factor, video codec, or content distribution standards
  - Facilitate cross-industry, flexible standards-setting process that will seek to accommodate international standardization concerns
  - Provide for rapid updating to prevent obsolescence
- Ensure effective content protection and do not force disaggregation of MVPD content from presentation
- Establish intellectual property guidelines for any AllVid standard-setting efforts