Seth D. Greenstein
Attorney at Law
202-204-3514
sgreenstein@constantinecannon.com

January 31, 2011

VIA ELECTRONIC FILING

Ms. Marlene Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: Ex Parte Presentation Notice, Video Device Competition, MB Docket No. 10-91; Commercial Availability of Navigation Devices, CS Docket No. 97-80; Compatibility Between Cable Systems and Consumer Electronics Equipment, PP Docket No. 00-67

Dear Ms. Dortch:

This letter is submitted pursuant to 47 C.F.R. § 1.1206.

Jeffrey T. Lawrence of Intel Corporation and the undersigned met with the following persons on January 26, 2011:

- David Grimaldi, Chief of Staff to Comm. Clyburn
- Joshua Cinelli, Media Advisor to Comm. Copps
- William Lake, Chief of the Media Bureau, Nancy Murphy, Associate Chief, Michelle Carey, Deputy Bureau Chief, Steven Broeckaert, Senior Deputy Chief of Policy Division, Alison Neplokh, Chief Engineer of Office of the Bureau Chief, and Brendan Murray, Media Bureau;

and with the following persons on January 27, 2011:

- Rosemary Harold , Legal Advisor, Media to Comm. McDowell
- Jennifer Tatel, Legal Advisor to Comm. Baker
- Paul deSa, Chief of Office of Strategic Planning and Policy Analysis, Douglas Sicker, Chief Technologist, and Marilyn Sonn, advisor to Chairman Genachowski

The purpose of the meetings was to express Intel's support for the issuance of a Notice of Proposed Rulemaking in the above-referenced "AllVid" proceeding. The representatives amplified and expanded upon the points made in Intel's Comments and Reply Comments in this proceeding, as summarized below.

As a general principle, Intel prefers the operation of the marketplace to regulatory intervention, but Intel also recognizes when Commission action has proved extremely valuable.

As a most recent example, in 2009, Intel petitioned the FCC for a waiver of the 1394 output mandate in favor of IP-based outputs from MVPD-supplied set top boxes. At that time, Intel said the waiver would create the single biggest, and quickest, springboard for introduction of smarter and more capable navigation products that integrate consumer media onto the television platform. With a waiver in place, Intel stated that it could offer to the U.S. market its systems on a chip processors that integrate powerful graphics processing, the most popular video codecs, and IP based outputs.

The marketplace is responding positively to the waiver, as Intel anticipated. At CES, Intel and other vendors demonstrated products with Intel's CE 4100 processors that pull content from a variety of sources onto the TV screen. Intel is working with numerous companies, including D-Link, Google TV, Boxee, Motorola, and Cisco, and internationally companies like Orange and Amino, to bring better user experiences to the large home screen. Intel also is a proponent of Smart TV initiatives, and works closely with numerous television manufacturers to supply powerful chips that facilitate today's innovation and future expansion.

Thus, actions taken by the Commission already have improved the home networked environment, as envisioned in the National Broadband Plan. But the environment still is missing crucial elements for competitive retail availability of navigation devices under Section 629. "App"-based smart TV content is a significant advance, but only scratches the surface of the innovation in content presentation and device and platform integration that a fully competitive environment could bring consumers. In other countries, that innovation and integration are already in process, and progress achieved abroad in these areas points to what the American market could become. To achieve that goal, Intel believes the Commission should proceed expeditiously toward a rulemaking and order supporting an AllVid adapter feeding MVPD-supplied content to the home network over standard protocols.

Intel believes the purpose of AllVid should not just be to bring the Internet to the TV screen, but also to better integrate the PC into the home entertainment network by bringing MVPD-supplied content directly to the PC in a secure but flexible way. Today's younger consumers enjoy the vast majority of their video-based media content on small, portable devices like laptops, tablets, and cell phones, rather than on the living room TV. At present, the two options for these consumers has been to use either a cumbersome OCUR box or dongle on the PC, which has attracted virtually no acceptance in the market; or to an MVPD-provided service such as TV Everywhere. Neither of these alternatives meets the definition of competitive retail availability of navigation devices as required by Section 629.

An AllVid gateway using standard communications protocols will enable the secure transmission of MVPD content to the PC platform, with key opportunities for industry and benefits for consumers:

1. Giving PC clients real time access to all content and services delivered by MVPDs, including open (e.g. broadcast), protected (e.g., subscription), and premium (e.g., video on demand and pay-per-view) content.

2. Enabling home PCs to act as digital video recorders for time-shifted content delivered by MVPDs.

3. Enabling better interaction between PC products and TVs; for example, swapping content between a TV and tablet like a distributed picture in picture.

4. Pulling together on the PC platform access to all the consumer's content, such as MVPD-supplied programming, stored content, and over-the-top services.

5. Accessing MVPD-supplied content via a subscription to the MVPD service, not via a broadband subscription.

Thus, AllVid will unleash the PC as a competitive navigation device platform by providing consumers access on the PC to content not available over the top, and empowering consumers to access all the content they have on the devices of their choosing. But it also will enable PC-based products to reduce broadband bandwidth consumption – an important consideration as today's "all you can eat" services contemplate future usage-based broadband charges.

For AllVid to work, Intel believes that the AllVid adapter should:

- Output content using Internet Protocol via standard physical and/or wireless interfaces
- Use standard protocols for communication to the network, device location, etc.,
- Use standard protocols for bidirectional commands between networked devices and the MVPD, including channel and services selection, purchasing options, etc.
- Provide video in standard formats (e.g., MPEG2 and H.264).
- Adopt content protection for networked communications (e.g., DTCP-IP)

All of these elements should rely on open standards and technologies available for license on a reasonable and nondiscriminatory basis. The standards used in DLNA provide almost all these capabilities today, and companies already are building products that can be upgraded to further leverage new capabilities in an AllVid environment. Thus, any challenges to adoption of AllVid are not technological.

Intel's representatives therefore urged the Commission to issue a Notice of Proposed Rulemaking in this proceeding at the earliest possible time .

In accordance with Section 1.1206 of the Federal Communications Commission rules, this letter is being provided to your office. A copy of this notice has been delivered via email to the persons listed below.

Respectfully submitted,

/s/ *Seth D. Greenstein*

Seth D. Greenstein

cc: Steven Broeckaert
Michelle Carey
Joshua Cinelli
Paul deSa
David Grimaldi
Rosemary Harold
William Lake
Mary Beth Murphy
Brendan Murray
Alison Neplokh
Douglas Sicker
Marilyn Sonn