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March 16, 2011

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

Re: 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:

On March 15, 2011, Julie Kearney, Vice President for Regulatory Affairs of the Consumer Electronics Association (CEA), and Parker Brugge, Director, Government Relations, Best Buy Co., Inc., on behalf of the Consumer Electronics Retailers Coalition (CERC), accompanied by the undersigned as counsel to CEA and CERC, met separately with Dave Grimaldi, Legal Advisor to Commissioner Clyburn, Jennifer Tatel, Legal Advisor to Commissioner Baker, and Chief Bill Lake, Deputy Chief Michelle Carey, Associate Chief Nancy Murphy, Policy Division Chief Mary Beth Murphy, Senior Deputy Policy Division Chief Steven Broeckaert, Chief Engineer Alison Neplokh, and Brendan Murray, all of the Media Bureau. On March 16, the same representatives met with Rosemary Harold, Legal Advisor to Commissioner McDowell.

In each meeting, the CEA and CERC representatives reiterated their support for the initiation of an AllVid rulemaking to accomplish all of the objectives that were set forth in Section 4.2 of the Commission's National Broadband Plan. These objectives were shown to be feasible in the Commission's Notice of Inquiry in Docket 10-91. The representatives cited the formation of the AllVid Tech Company Alliance, and the Alliance's filings with the Commission, as ample evidence that a broad range of companies in the technology sector are prepared to participate in a competitive market for navigation devices, once the FCC has taken the necessary steps, as mandated in Section 629, to assure one.

The representatives noted that progress in connected devices illustrates the potential benefits of IP-based interfaces, but also the limitations, for national device and programming markets, of relying on MVPD-specific and device-specific solutions. They reiterated that a standards-based national IP interface supported by MVPD-specific gateways, as set forth in the National Broadband Plan, is essential to assure a national retail market for competitive devices, and to better foster competition by enabling consumers to choose among MVPD services.

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This letter is being provided to your office in accordance with Section 1.1206 of the Commission's rules. The proceedings at issue are not restricted, therefore presentations are permitted but disclosure not required.

Respectfully submitted,

Robert S. Schwartz

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cc:

Dave Grimaldi
Rosemary Harold
Jennifer Tatel
Bill Lake
Michelle Carey
Nancy Murphy
Mary Beth Murphy
Steven Broeckaert
Alison Neplokh
Brendan Murray