

ALLVID
Tech Company Alliance

April 5, 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 30, the following member companies of the The AllVid Tech Company Alliance (“Alliance”) met separately with Rosemary Harold, Legal Advisor to Commissioner Robert McDowell; and Josh Cinelli, Legal Advisor to Commissioner Michael Copps: Jeffrey Lawrence, Director, Digital Home and Content Policy, Intel Corporation and Seth Greenstein, Constantine Cannon, as counsel to Intel; Adam Goldberg, consultant to NagraVision; Jeff Kardatzke, Chief Technology Officer, SageTV; and Jim Barton, Co-Founder, Senior Vice President and Chief Technology Officer and Matthew Zinn, Senior Vice President and General Counsel, of TiVo, Inc; accompanied by the undersigned as a counsel to the Alliance.

On March 31, Todd Hartman, Vice President and Associate General Counsel and Parker Brugge, Director, Government Relations, Best Buy Co., Inc.; and Jeffrey Lawrence, Jeff Kardatzke, and Jim Barton, accompanied by the undersigned as a counsel to the Alliance, met with Deputy Chief Michelle Carey, Associate Chief Nancy Murphy, Policy Division Chief Mary Beth Murphy, Chief Engineer Alison Neplokh, Lyle Elder, and Brendan Murray, all of the Media Bureau.

In these meetings the Alliance noted that Section 629 of the Communications Act directs the Commission to pursue a standards-based solution for competitive devices in consultation with appropriate standards-setting organizations. As envisioned in Recommendation 4.2 of the National Broadband Plan, technologies comprising a nationally standard IP-based interface should be available for license on reasonable and nondiscriminatory terms, so as to assure device interoperability for the receipt of MVPD programming and services. The Alliance said that it is important to both competitive entry and the continued utility of products to consumers for licensing and certification to be available from the organizations that develop referenced technologies, rather than from MVPDs themselves, or their vendors, on a proprietary basis. The Alliance urged the Commission to take the steps necessary to implement Congress’s directive that the

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Commission *assure* in its regulations that the standards basis for a competitive market, for navigation devices that receive all MVPD programming and service offerings, is in place.

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

Robert S. Schwartz
Constantine Cannon LLP
1301 K Street, N.W., 1050 East
Washington, D.C. 20005
202 204-3508

Cc:

Josh Cinelli
Rosemary Harold
Michelle Carey
Nancy Murphy
Mary Beth Murphy
Alison Neplokh
Lyle Elder
Brendan Murray