

Seth A. Davidson
(202) 939-7924
sdavidson@eapdlaw.com

April 15, 2011

Ms. Marlene Dortch
Secretary
Federal Communications Commission
445 12th Street, 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*
Ex Parte Presentations

Dear Ms. Dortch:

On April 14, 2011, William Bauer and Steve Effros of Beyond Broadband Technology (“BBT”), together with the undersigned, met with Rosemary Harold, legal advisor to Commissioner Robert McDowell and Jennifer Tatel, legal advisor to Commissioner Meredith Atwell Baker and also with William Lake, Mary Beth Murphy, Nancy Murphy, Brendan Murray, Michelle Carey, Steve Broeckaert, Alison Neplokh, and Lyle Elder of the Media Bureau and Douglas Sicker, Chief Technologist. Mr. Bauer and Mr. Effros also met with Joshua Cinelli, legal advisor to Commissioner Michael Copps and with Dave Grimaldi, legal advisor to Commissioner Mignon Clyburn.

During the above-referenced meetings, Mr. Bauer and Mr. Effros reviewed the history of the BBTSolution® and how the Commission has encouraged the development of innovative security solutions, including downloadable security solutions, as an alternative to the CableCARD. Mr. Effros and Mr. Bauer described how the first set-top boxes incorporating the BBTSolution are now currently being manufactured and deployed in multiple cable systems. They also noted that BBT’s downloadable security technology has evolved so that it can be incorporated into a variety of form factors, including thumb drives, smartcards and dongles, and can be used on a platform agnostic basis, including cable, satellite and the Internet. Most significantly, in response to questions raised by the Commission in previous meetings, BBT has now confirmed that the BBTSolution® can establish a secure communications path providing downloadable security options not only for the delivery of content from a distribution platform (such as cable, satellite, the Internet, etc.) to the home, but also for secure distribution of content within the home and, as significant, to individual devices (such as an enabled television set, Blu-ray player, DVR or iPad).

After discussing the background of the BBTSolution® and its technical capabilities, Mr. Bauer and Mr. Effros turned their attention to the pending “AllVID” proceeding, reviewing and restating many

of the points made in Mr. Bauer's April 1, 2011 letter to Chairman Genachowski and Commissioners Cops, McDowell, Baker and Clyburn. In particular they emphasized that it was critically important that the Commission, should it move forward with a Notice of Proposed Rulemaking, clearly differentiate between a "secure communications path" and "downloadable conditional access," both of which are important aspects of any overall system that would be needed for a successful "AllVid" ecosystem. While Mr. Bauer and Mr. Effros stressed that BBT was not advocating the adoption of any mandated standard, they urged that if the Commission nevertheless moves forward in this area, it should consider and solicit comment on alternatives that could form the foundation for a secure, interoperable approach.

Respectfully submitted,



Seth A. Davidson
Edwards, Angell, Palmer & Dodge LLP

cc: Rosemary Harold
Jennifer Tatel
William Lake
Mary Beth Murphy
Brendan Murray
Lyle Elder
Nancy Murphy
Alison Neplokh
Michelle Carey
Steve Broeckaert
Doug Sicker
Joshua Cinelli
David Grimaldi