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September 30, 2011

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

Re: CS Docket No. 97-80 (Commercial Availability of Navigation Devices)

Dear Ms. Dortch:

In its Second Report and Order in CS Docket No. 97-80,¹ the Commission directed certain multiple system operators (“MSOs”) to file periodically with the Commission “reports detailing CableCARD deployment and support” as well as “the effort to develop and deploy a Multistream CableCARD.” The Commission noted that the “cable operators may file separate reports or a joint report.” As a matter of convenience, NCTA has compiled the individual company reports and is submitting them as attachments to this letter. Should the Commission have questions about any of these reports, please contact me and I will ensure that the questions are forwarded to the appropriate person at the relevant company for a response.

CableCARD Deployment and Support. The five MSOs who are required to report today – Cablevision, Charter Communications, Comcast Corporation, Cox Communications, and Time Warner Cable – have deployed over 548,000 CableCARDS for use in retail CableCARD-enabled devices. When the CableCARDS deployed by the next five largest incumbent cable operators are included, there have been over 585,000 CableCARDS deployed for use in retail devices by the ten largest incumbent cable operators. *By contrast, since the “integration ban” went into effect on July 1, 2007, those 10 companies have also deployed more than 30,000,000 operator-supplied set-top boxes with CableCARDS.*

¹ *Implementation of Section 304 of the Telecommunications Act of 1996: Commercial Availability of Navigation Devices, Second Report and Order, 20 FCC Rcd 6794 (2005).*

Multistream CableCARDS. The Commission also asked for periodic reports on the "effort to develop and deploy a Multistream CableCARD." All CableCARD manufacturers have CableLabs Qualified Multistream CableCARDS that exist in various configurations: Cisco, CCAD (Motorola), Cisco/NDS and Corecross/NDS. CableLabs has provided testing of UDCPs for conformance to the M-Card interface test suite since January of 2007. Devices from TiVo and other manufacturers have been verified under this test program. Tru2way host devices and OpenCable Unidirectional Receivers OCUR (for connection to PCs) also make use of the M-Card interface. Major cable operators have been deploying M-Cards since 2007.

If you have any questions about the information being submitted with this letter, please do not hesitate to contact me.

Respectfully submitted,

/s/ **Neal M. Goldberg**

Neal M. Goldberg

cc: Brendan Murray
Julie Kearney
Robert Schwartz

Cablevision Systems FCC CableCARD Quarterly Report¹

CableCARD technology, which enables digital televisions to display encrypted programming, has been available to 100% of Cablevision customers since July 1, 2004. The installation and service of CableCARDS is a routine practice and has been fully incorporated into the business. As with all technical service issues, each occurrence is logged into an automated database for escalation and resolution.

1. Current Number of CableCARD Subscribers: 25,303 (as of September 13, 2011). This represents a 1% increase in deployment from the 2011 2nd quarter report.

2. Number of CableCARDS in Inventory: 55,557 total CableCARDS in inventory (36,692 CableCARDS deployed and 18,865 in non-deployed inventory). On average, we have 1.45 CableCARDS deployed per CableCARD household. Our inventory numbers includes the inventory for our Optimum West locations (former Bresnan).

3. How are CableCARDS deployed: Cablevision customers are able to obtain CableCARD equipment from the Cablevision Optimum Store and perform a self-installation of M-CableCARDS in their DCR CableCARD-compatible devices. Cablevision customers can also request a professional installation of their CableCARD.

4. Percentage of Installs: For this reporting period, 43% or 1,395 of installs were professional installs and 57% or 1,851 were customer self-installation.

5. Average Number of Truck Rolls to Install a CableCARD: 1.0

6. Monthly Lease rate for CableCARD: \$2.00

7. Average installation Cost (if applicable): Professional install fee for the CableCARD(s) is \$34.95.

8. Number of problems encountered with CableCARDS: 3,108 installation and post-installation Remedy tickets were opened during the period of 06/06/2011 to 09/08/2011.

- Host Related: 39%
- CableCARD related including rebooting CableCARDS: 60%
- Network Related: 1%

¹ This CableCARD Quarterly report is inclusive of our Cablevision, Cable and Communications division only. Unless otherwise indicated, it does not contain information regarding our Optimum West operations (former Bresnan holdings). We are currently in the process of incorporating the Optimum West operations into our performance metrics and operational reports. Our next CableCARD report will contain a consolidation of all CableCARD responses within Cablevision.

9. Of the problems encountered, please list how they were resolved: (Ex. TV Firmware upgrade)

Host DCR TV Issues (Sample)

Problem Description: CableCARD does not bind with the host - Swap the CableCARD.

Occurs During: Installation

Resolution: The technician will first unbind the CableCARD and install/bind another CableCARD. In some instances, the customer may need to contact the host TV manufacturer for a patch to be sent out for the specific host TV or arrange for a professional visit by the manufacturer's technician.

Problem Description: Pixilation on most digital channels

Occurs During: Post-Installation

Resolution: Replace the service drop or components to verify signal levels are within specification or customers may need to contact the manufacturer directly to have a Certified Technician perform a service call to install new hardware in the DCR TV chassis.

Problem Description: DCR TV missing premium channels

Occurs During: Post-Installation

Resolution: Perform a "reboot" by removing the CableCARD and turning the DCR TV off. Channels are usually restored.

CableCARD Issues (sample)

Problem Description: Customer getting CableCARD "no service" message.

Occurs During: Post-Installation

Resolution: Send a "hit" to the CableCARD or have the customer remove and replace the CableCARD from the DCR TV.

Problem Description: CableCARD error 161-4

Occurs During: Post-Installation

Resolution: Send a billing system "hit" to the CableCARD and reset the DCR TV

Problem Description: Customer has black screens on premium channels only.

Occurs During: Post-Installation

Resolution: Send a "hit" to the CableCARD. Have the customer turn off the DCR TV and remove and replace the CableCARD.

Cablevision has established technical support protocols to enable the technician to receive immediate troubleshooting support from Dispatch, Network Support or Engineering, if the technician encounters a problem during the professional installation of CableCARD equipment. It should be noted, that Cablevision responds to each CableCARD performance issue in the same manner we respond to other CE interoperability issues (e.g., DVI, HDMI or 1394 interoperability issues).

If the technician is unable to complete the installation due to technical issues, the technician is required to record the reason(s) why the install was not completed and the work order remains open. At the customer's request, a follow-up visit is conducted to further troubleshoot the problem and/or install a second (new) CableCARD. At this visit, additional personnel may accompany the technician to provide enhanced technical support. If a customer is unable to activate their equipment due to interoperability issues, Cablevision will contact the CE manufacturer to define the issue, resolve the problem and once again offer the customer the CableCARD installation.

The data (fix codes) collected from the problem are analyzed by the operations and engineering departments to determine if there are any systematic issues contributing to the CableCARD technology not functioning properly on the network.

Cablevision has also undertaken significant steps to pro-actively work with all the major CE manufacturers to identify the numerous CableCARD enabled devices and conduct interoperability testing in our (single) test laboratory before any problems have been experienced in the field.

**Charter Communications
FCC CableCARD Reporting
June 1, 2011 to August 31, 2011**

1. Current number of CableCARD subscribers:

The total number of CableCARDS in service through August 31, 2011 is 31,425.

2. Provide the number of CableCARDS in inventory:

Motorola Multistream	7,321
Motorola Standard	5,597
SA Multistream	1,830
SA Standard	1,359
Grand Total	16,107

3. How are CableCARDS placed in service?

As of August 1, 2011, customers may request a professional installation, or may self-install. In June and July, installations of a CableCARD required a professional installation in all serviced areas.

4. Whether service calls are required for all CableCARD installations?

As of August 1, 2011, service calls are not required for CableCARD installation.

5. Average number of truck rolls to install a CableCARD?

The average number of truck rolls to install a CableCARD (i.e., the initial truck roll and any truck rolls within 30 days from the date of installation) through August 31 was 1.5.

6. Monthly lease rate for a CableCARD?

The monthly lease for a CableCARD device is \$2.00.

7. Average installation cost of a CableCARD (if applicable):

The average cost for a professional installation is \$35.00.

8. Process for resolving CableCARD trouble calls:

Customers with a CableCARD problem are directed to call the Charter customer service number. Customer Service Representatives (CSRs) are trained about the features and benefits of CableCARDS, just as they are trained on any other Charter product offering. Some CableCARD calls are forwarded to the Advanced

Services Team, whose members have more training and expertise on troubleshooting such calls. If the problem cannot be resolved over the phone, the CSR places a service order, which is then fulfilled by the cable installers and technicians. Charter maintains a record of any service calls for which a technician is dispatched.

Should a local cable installer or technician encounter a CableCARD problem, he/she reports such problem to his/her supervisor and the local technical support group. If the problem is not resolved at the local level, it is then escalated to corporate engineering or billing. If there appears to be a host problem, Charter has a designated member of its engineering department contact and place a report with the consumer electronics vendor or with the host manufacturer to resolve the issue as appropriate.

9. Reported problems associated with CableCARDs and how they were resolved:

Charter has experienced a steady decline in problems with its CableCARDs since reporting began,¹ a trend which continues this quarter with no verified problem resulting from CableCARDs.

With the exception of the below listed issues, CableCARD problems encountered this quarter were routine installation issues. Network problems were resolved at the time of installation through Charter’s standard troubleshooting processes. Some installation problems reflect troubleshooting of new processes and manufacturer support for self-installation of tuning adaptors. Charter will continue to troubleshoot and resolve problems occurring with various makes and models of digital television hosts as they arise.

The illustrative problems with CableCARD installation and resolution for this quarter are listed below. The device manufacturer is identified by a letter only to maintain confidentiality, with such letters corresponding to those used in previous Charter reports.

DIVISION(S)	ISSUE	RESOLUTION	HOST MFGR.
various	Channels were missing from CableCARD-enabled device.	Charter technicians fixed codes, re-ordered equipment, and power cycled host devices and tuning adapters.	various

¹ See *Charter Communications FCC CableCARD Reporting*, March 1, 2011 – May 31, 2011, p. 2, Attachment to Letter from Neal M. Goldberg to Marlene H. Dortch, *Commercial Availability of Navigation Devices*, CS Docket 97-80 (filed June 30, 2011).

various	The host manufacturer's customer support for tuning adapters appears to be configured for only one brand of adapter.	Charter has notified the manufacturer of this concern and is awaiting feedback.	L
various	Customers were unable to receive channels using particular host devices.	Charter's customer care representatives were retrained on how Charter supports the devices, resolving the problem.	N
various	Customers were unable to tune channels using particular host devices.	The host devices were repaired with the CableCARDS and worked properly.	N

Comcast
FCC CableCARD Report
5/22/11 – 8/21/11

Current Number of CableCARDS installed in active customer homes	367,064
Number of CableCARD in Inventory	221,635
How are CableCARDS deployed: Truck Roll / Self Install / Both	Both
Total CableCARD New Installs	38,403
Number of Installs - Truck Rolls	19,030
Percentage of Installs - Truck Rolls	50%
Number of Installs - Self Installs	19,373
Percentage of Installs - Self Installs	50%
Average Number of Truck Rolls to Install a CableCARD	1.03
Monthly Lease Rate for Initial CableCARD	\$0.00
Monthly Lease Rate for Additional CableCARD	\$1.50
Average Installation Cost if part of installation of other services	\$7.15
Average Installation Cost if separate trip	\$26.00

Process for Resolving CableCARD Problems

The Comcast CableCARD problem escalation process begins with the local installer/technician and escalates to local supervisory personnel, then to the Division office, and finally to corporate engineering for further escalation to CableLabs or to senior contacts at the CE manufacturer as needed. The local market is expected to review CableLabs lists of Verified devices and any lists of any known issues prior to escalation. If an issue with the CE Host device is suspected the local market personnel also make an initial contact to the CE manufacturer's standard support line for help prior to escalation.

Examples of Specific Issues and Resolutions

Customers occasionally attempt to move a CableCARD from one device to another creating service issues. CableCARDS do not automatically work properly when moved to a different device as the Card and the Host must be "paired" in the headend control system. Comcast personnel and control systems are not equipped to handle moving CableCARDS in this manner so these situations require escalation to restore service in the new device. Comcast discourages this practice.

Many flat panel Plug and Play televisions have the CableCARD slot in the back making it impossible to access the slot for CableCARD installation and maintenance when the set is wall mounted.

Cox Communications FCC CableCARD Reporting
6/1/11 through 8/31/2011

1. The number of Residential CableCARDS in service:

Cox TOTAL: 50,791
Moto Total: 21,689
Cisco Total: 29,102

2. General availability of CableCARDS:

Total CableCARDS available: 18,404

- a. Please provide an indication of supply availability for CISCO and Motorola CableCARDS

Cisco CableCARDS: 10,913
Moto CableCARDS: 7,491

*The above numbers only include inventory available in our billing system and inventory currently assigned to FSRs. It does not include inventory assigned to subscriber accounts, inventory pending disposition or repair, etc.

3. How cards are placed in service

A professional installation or self-install.

4. Whether service calls are required for all CableCARD installations?

No. Self-install is now an option

5. Average number of truck rolls to install a CableCARD?

The average number of truck rolls needed to install a CableCARD includes the initial truck roll for the install itself and any truck rolls required within 30 days of the install.

The average number of truck rolls to install a CableCARD was: 1.1

6. Monthly price charged for a CableCARD?

The average monthly rental for a CableCARD is \$1.99

7. Average installation cost of a CableCARD if applicable?

- a. What is the service charge to the subscriber for the installation?

The average cost for a professional installation is \$24

8. Problems encountered in deploying CableCARDS and how problems are resolved?

CableCARD Problems

- None

9. Process in place for resolving existing and newly discovered CableCARD implementation problems:

For any CableCARD issues encountered by a subscriber, Cox follows a prescribed troubleshooting process. If the troubleshooting resolves the issue, no further action is taken. If the troubleshooting procedures do not correct the issue, the issue is escalated to one or more of the following personnel within the system: (i) the Digital test desk; (ii) the IT group, and/or; (iii) the system's DAC or DNCS administrator. If none of the foregoing is able to resolve the

Cox Communications FCC CableCARD Reporting
6/1/11 through 8/31/2011

issue, a problem form is completed and sent to corporate engineering. The problem form collects specific details about the problem and alerts the engineering team to the relevant issues. Corporate engineering then follows up on the issue, contacting all of the necessary parties (including the CE manufacturers) until the issue is resolved.

In addition, Cox maintains an intranet site containing information about CableCARDS and specific issue updates. Cox Customer Support, Field Service, and Field Service Support also may use this site to review troubleshooting guidelines or details from CE manufacturers.

The DAC and DNCS administrators in each system also have direct connections with ATL operations and engineering to escalate any issues that require immediate assistance.

**Time Warner Cable
FCC CableCARD™ Status Report
June 2011 – August 2011**

Current number of CableCARDS activated: **74,047**

Current number of unique CableCARD customers: **53,503**

Number of CableCARDS available in inventory: **50,989**

How are CableCARDS deployed? **Historically, TWC generally required a service appointment for CableCARD installations. However, new FCC rules went into effect on August 8, 2011 that require cable operators to support self-installations. TWC has taken steps to comply with those rules.**

Percentage of installs: **Service Appointment: 87%; Self Install: 13%;**

Average number of truck rolls required to install a CableCARD: **1.03**

Monthly lease rate for CableCARD: **Average: \$2.50**

Do you charge for CableCARD installs? **Some divisions charge a standard installation fee for CableCARDS while others waive the installation charge per division business procedure.**

What is the average installation cost? **\$26.64**

What is your process in resolving existing and newly discovered CableCARD implementation problems?

The processes reported in our previous submissions are still in place. The internal TWC SharePoint website is still in use for resolving existing and new CableCARD problems. The website also allows TWC divisions to share information on issues and work together to resolve them. The central CableCARD support desk continues to serve as an escalation point for all divisions and will shepherd an issue until resolution.

Problems encountered with CableCARDS and their resolution

Our divisions continue to report a variety of different issues arising with respect to CableCARD host device installations.

Problem: Incorrect software/ firmware on host devices continue to cause reported issues and are common across all CE brands.

Resolution: The standard procedure is for the cable technician to inform the customer that a software patch from the CE manufacture is required to upgrade the Host and correct the issue. After the CE manufacturer has completed the upgrade, a follow-up service appointment is needed to re-install the CableCARD.

Problem: Missing or no channels on Host device due to faulty or non-compliant in-home wiring devices installed by customers, such as splitters and coaxial jumper cables.

Resolution: A cable technician replaces equipment and brings signal levels into specification.

Problem: Host device losing services.

Resolution: Contact the CE manufacturers and work together on a resolution. In most cases, a firmware or hardware update is required depending on the model and date of manufacture. Replace CableCARD and/or resend billing activation codes.