



Hauppauge Computer Works, Inc.  
91 Cabot Court  
Hauppauge, NY 11788

December 29, 2011

Re: Basic Service Tier Encryption, MB Docket 11-169

**VIA ELECTRONIC FILING**

Ms. Marlene Dortch  
Federal Communications Commission  
Washington, DC 20554

Dear Ms. Dortch,

Hauppauge is submitting these comments in response to a letter sent to you by Mr. Neal M. Goldberg of the National Cable and Telecommunications Association (NCTA)<sup>1</sup> on December 29, 2011 and in a filing made by Cablevision Systems Corporation<sup>2</sup> made on November 29, 2011

**Clear QAM is more widely used than either the NCTA or Cablevision acknowledge**

In the NCTA letter, Mr. Goldberg states in footnote 9 "*The few customers who now rely on clear QAM TVs for basic-only service can use similar CableCARD-devices, or use transitional equipment which will be provided without charge by cable operators*".

In the Cablevision letter, it is stated "In addition, any attendant disruptions of service would

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<sup>1</sup> Letter from the NCTA to Ms. Marlene Dortch, December 29, 2011  
<http://fjallfoss.fcc.gov/ecfs/document/view?id=7021752160>

<sup>2</sup> Comments of Cablevision Systems Corporation, November 28, 2011  
<http://fjallfoss.fcc.gov/ecfs/document/view?id=7021748529>

affect *only a small number of subscribers* and can be virtually eliminated through the adoption of narrowly tailored consumer protection methods.”<sup>3</sup>

Regarding those who would be affected if clear QAM TV were discontinued, the NCTA says “The few customers ...” while Cablevision says “... affect only a small number of subscribers”.

It is Hauppauge’s belief, through our interaction with consumers who are using our clear QAM enabled TV tuner products, that clear QAM is used by a wider number of consumers than either the NCTA or Cablevision Systems acknowledge. In addition to homes in which clear QAM is the only way to watch basic cable TV, clear QAM is often used with secondary TV sets in homes which also have cable boxes.

Since the digital TV transition in 2009 and after the reclamation of the analog bandwidth on cable TV plants over the last few years, clear QAM is the last remaining method of inexpensively receiving cable TV.

Since it is difficult to quantify the number of consumers who use clear QAM (basic cable users don’t report whether they use clear QAM enabled TV sets or other types of clear QAM devices and whether clear QAM is the sole way of receiving TV or is just used on occasional or spare TV sets), we believe it is prudent that we should attempt to quantify the number of clear QAM TV receivers which would be effected by these proposed rules. Instead of statements such as “... few customers ...” and “... small number of subscribers ...”, a study will show how many consumers these rules will really affect.

**A cable TV box consumes more power than no box at all, and eliminating truck rolls simply moves gasoline consumption from the cable TV company to the consumer**

In the NCTA letter, Mr. Goldberg states once again in footnote 9 “Finally, Hauppauge raises concerns over energy efficiency, see Hauppauge reply at 5-6, but the transitional equipment that cable operators typically provide, such as DTAs, use very little power.”

It is clear that any box, even a DTA box, consumes more power than no box. According to Cablevision (as noted below), 19,099 truck rolls were eliminated in three months out of 401,000 households. Assuming eliminating these 19,099 truck rolls required one new cable TV box using 15 watts of power, this would consume 131 kilowatt hours per year per device or 2.5 million kw hours to save the 19,099 truck rolls. And these numbers are simply for three months in an area of 401,000 households. If 76,396 households in the 401,000 household

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<sup>3</sup> Section II. of the Cablevision filing is entitled “CABLEVISION’S EXPERIENCE SHOWS THAT ALLOWING ENCRYPTION OF THE BASIC SERVICE TIER FOR ALL-DIGITAL CABLE SYSTEMS CREATES SIGNIFICANT BENEFITS WHILE AFFECTING ONLY A MINISCULE NUMBER OF SUBSCRIBERS”

area changed their cable TV service in a year (which is reasonable considering the typical churn rate) and at that time they were required to replace clear QAM with just one new cable TV box, then the additional power cost of these 60,000 households would be over 10 million kilowatt hours per year. This compares with 0 power used by clear QAM.

Cablevision states in their filing on page 12<sup>4</sup> “Eliminating the vast majority of truck roll disconnects nationwide would result in clear customer service benefits in terms of increased convenience and environmental benefits in terms of reduced fuel consumption, traffic, and CO<sub>2</sub> emissions”. Cablevision states in the previous paragraph “Since the time of Cablevision’s last report (at the beginning of August 2011) to the end of October 2011, Cablevision has reduced its disconnect truck rolls in that area by 19,099”. The area referred to is a 401,000 household area.

If clear QAM TV were discontinued, the benefits accrued by reducing truck rolls is reduced by the effect of consumers needing to drive to the cable TV office and pick up a cable TV box when they start their service, and then the trip back to the cable TV office when they discontinue their service. We are simply replacing the CO<sub>2</sub> emissions and gasoline usage of a cable TV owned vehicle by consumer vehicles. And there will be a lot of trips. Based on Cablevisions numbers, 19,099 truck rolls to discontinue service were eliminated in the three month period of August 2011 through the end of October 2011. This is 4.7% of the 401,000 households serviced in this area. Annualize this number and you have 76,396 trips which would need to be taken by consumers to return the boxes which are required in the discussed Cablevision service area.

If consumers were required to use cable TV boxes in place of clear QAM and to drop off these boxes at their local cable office when they discontinued their service, the gasoline usage would simply be paid for by the consumer instead of the cable TV provider.

## **Conclusion**

We believe that the number of clear QAM users is underestimated. Before eliminating clear QAM, the cable TV industry should quantify how many customers will be affected by the proposed rules.

And we believe the environmental benefits of replacing clear QAM TV service with a cable TV box is not correct, and in fact there will be more power used should these rules be put into effect.

As stated in our original comments, we should be doing what we can to reduce power

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<sup>4</sup> Section II A entitled “The Subscriber and Public Benefits of Basic Service Tier Encryption Are Bourn Out by Cablevision’s Experience in New York City”

consumption in the United States, not increase it.

Thank you for your consideration of these remarks.

Regards,

Ken Plotkin

Chief Executive Officer

Hauppauge Computer Works, Inc.

e-mail: [kenp@hauppauge.com](mailto:kenp@hauppauge.com)

tele: 631-434-1600 ext. 350