

January 20, 2012

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

Re: Basic Service Tier Encryption; Compatibility Between Cable Systems and Consumer Electronics Equipment, MB Docket No. 11-169, PP Docket No. 00-67.

Dear Ms. Dortch:

On January 18, 2012, Jim Coltharp and Jordan Goldstein of Comcast Corporation and the undersigned spoke with Michelle Carey of the Media Bureau about the Commission's basic tier encryption Notice of Proposed Rulemaking ("NPRM").

During the phone conversation, we reiterated the consumer benefits associated with allowing cable operators to encrypt the basic service tier in all-digital cable systems. In particular, we discussed the dramatic impact that basic tier encryption would have on truck rolls in Comcast service areas. Consistent with Comcast's comments in this docket, *see* Comcast Comments at 6-7, we noted that encryption would reduce truck rolls to disconnect service by an estimated 90% and reduce truck rolls to reconnect service by an estimated 45%. Encryption would thereby eliminate thousands or even millions of truck rolls in Comcast's all-digital systems and provide added convenience to Comcast customers as well as environmental benefits from reduced vehicle traffic in Comcast service areas.

In response to questions from Ms. Carey, we explained why the figures for remote service disconnects are likely to be relatively higher than for remote service reconnects, at least in the near term. With respect to service disconnects, with encryption, there is typically no reason for a truck roll; a customer might have to return equipment but would generally do that on his or her own.

We noted that the situation is more complicated with respect to service reconnects. Remote service activations are likely to be commonplace in situations where a new customer is signing up for cable service that involves a simple connection of a set-top box or CableCARD-enabled device to a TV set, or connecting a cable modem for high-speed Internet service to a single PC or laptop. In fact, our experience with existing cable customers in markets where we are going all-digital demonstrates a strong preference to self-install DTAs or other equipment versus having to schedule a service appointment. *See id.* at 5. However, in certain cases in which new cable customers sign up for one or more additional services, such as voice, high-speed Internet with a wireless home network, or whole-

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home DVR services, service activations can be more complex and, in those instances, may require a professional installation. For example, customers taking voice service may need changes to their in-home wiring in order to activate their existing phone jacks. Similarly, multi-room DVR service, which involves the sharing of content across multiple devices in the home network, requires the installation of a “point-of-entry” filter to ensure that content remains within the home network. The typical customer may not be able to handle these types of more complex installations on a self-install basis. We noted that, over time, truck rolls for service reconnects could be reduced further as Comcast gains increased confidence that wiring in customers’ homes is adequate to support remote installations of multiple services.

Kindly direct any questions regarding this matter to my attention.

Sincerely,

/s/ Jonathan Friedman

Jonathan Friedman

Counsel for Comcast Corporation

cc: Michelle Carey