

January 25, 2012

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

Re: **CSR-8537-Z/CS Docket No. 97-80**  
**Adams Cable Equipment, Inc. Request for Waiver of the Integration Ban**

Dear Ms. Dortch:

On January 25, 2012, I met with Bill Lake, Michelle Carey, Nancy Murphy, Brendan Murray, Mary Beth Murphy, and Steven Broeckaert of the Media Bureau on behalf of Adams Cable Equipment, Inc. (“ACE”) in support of its waiver request in this proceeding. The substance of the meeting is described below.

In 2010, the Bureau granted a waiver to Baja Broadband that enabled Baja to purchase refurbished integrated set-top boxes from ACE, which had committed also to offer to sell its devices directly at retail to Baja’s customers. The Bureau found that it served the public interest to provide these customers with another retail option for navigation devices. ACE now seeks the ability to offer that option to customers of other cable companies around the country.

I showed the attached screen shots of ACE’s website and explained that consumers would be able to select participating cable operators from a menu to see only the set-top boxes that would be compatible with their system. ACE would ship set-tops with self-installation instructions and notify the cable operator of the identification information for the specific box sold so that the operator could be prepared to activate the device. ACE would provide customer support and a one-year warranty on its retail devices.

Grant of the requested waiver would make an immediate material, difference in the options available to consumers for retail set-top boxes. The waiver would create a new opportunity for consumers that does not exist today – the ability to purchase a low-cost set-top

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box for as little as \$40, with no service or rental fees for the life of the box. Even a customer with a retail CableCARD device pays their cable operator as much as \$36 a year or more to rent a CableCARD.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "PBH", written in a cursive style.

Paul B. Hudson  
Counsel for Adams Cable Equipment, Inc.

Attachment

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MODEMS

SET TOP BOXES

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Broadband  
**CUSTOMERS  
SHOP NOW**

**CLICK HERE  
FOR PRODUCTS**

**BAJA BROADBAND CUSTOMERS CAN NOW PURCHASE CABLE BOXES FROM ADAMS CABLE EQUIPMENT.**

**CLICK HERE TO VISIT THE PRODUCT PAGE.**

**HAVE THE UNIT SHIPPED RIGHT TO YOUR HOME, AND A BAJA BROADBAND TECH WILL COME AND INSTALL THE BOX FOR YOU.**

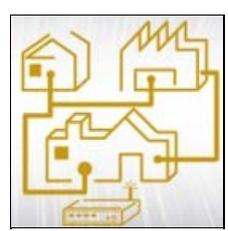


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