

June 27, 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 June 26, 2012, Kathy Zachem and Jordan Goldstein of Comcast Corporation, Melissa Marks of Boxee, Inc., Ross Buntrock and Alan Fishel of Arent Fox LLP, and the undersigned of Willkie Farr & Gallagher LLP met with the following Commission staff to discuss the Commission's basic tier encryption Notice of Proposed Rulemaking ("NPRM"): Sherrese Smith, Chief Counsel and Legal Advisor to Chairman Genachowski; Bill Lake, Chief of the Media Bureau; Henning Schulzrinne, Chief Technology Officer; Lyle Elder, Attorney Advisor to Chairman Genachowski, Michelle Carey, Deputy Bureau Chief of the Media Bureau, and Nancy Murphy, Steve Broecker, Alison Neplokh, and Brendan Murray of the Media Bureau.

Comcast and Boxee representatives updated Commission staff on discussions between Comcast and Boxee on an initial and a long-term solution for consumers with retail IP-capable Clear QAM devices ("third-party devices") to access encrypted basic tier channels in Comcast's all-digital cable systems once the Commission allows for such encryption. These solutions are intended to address the various concerns raised by Boxee in the record in this rulemaking,¹ as well as the Commission's questions about possible transitional equipment measures in the NPRM.²

¹ See, e.g., Letter from Melissa Marks, General Counsel, Boxee, to Marlene H. Dortch, Secretary, FCC, Dkt. No. 11-169 (Feb. 2, 2012) (detailing concerns regarding impact of basic tier encryption on Clear QAM devices); Letter from Melissa Marks, General Counsel, Boxee, to Marlene H. Dortch, Secretary, FCC, Dkt. No. 11-169 (Mar. 19, 2012) (same); see also Letter from Neal M. Goldberg, General Counsel, NCTA, to Marlene H. Dortch, Secretary, FCC, Dkt. No. 11-169 (Feb. 7, 2012) (responding to Boxee concerns); Letter from Neal M. Goldberg, General Counsel, NCTA, to Marlene H. Dortch, Secretary, FCC, Dkt. No. 11-169 (Feb. 21, 2012) (detailing equipment options for Boxee and Boxee customers).

² See *In the Matter of Basic Tier Encryption*, Notice of Proposed Rulemaking, 26 FCC Rcd. 14870, ¶ 13 (2011) (seeking comment on transitional equipment measures for basic tier customers impacted by basic tier encryption).

Marlene H. Dortch

June 27, 2012

Page 2

- The initial solution involves the development as soon as possible of a high-definition digital transport adapter with an ethernet connector (“E-DTA”). This solution would enable a customer with a third-party device to access basic tier channels directly through an ethernet input on such third-party device or via the home network, and to change channels remotely in the E-DTA via a DLNA protocol.
- The long-term solution, which would follow shortly after the initial solution, involves the creation of a licensing path for integrating DTA technology into third-party devices (“Integrated DTA”). Such a device could access encrypted basic tier channels without the need for a cable operator-supplied DTA or set-top box.

Comcast and Boxee representatives expressed their belief that the initial and long-term solutions provide a strong foundation for a final order in the above-referenced proceeding by resolving issues raised by Boxee in the basic tier encryption rulemaking while also enabling cable operators to encrypt the basic service tier in their all-digital systems as quickly as possible.

Kindly direct any questions regarding this matter to my attention.

Sincerely,

/s/ Jonathan Friedman

Jonathan Friedman

Counsel for Comcast Corporation

cc: Sherrese Smith
Bill Lake
Henning Schulzrinne
Michelle Carey
Lyle Elder
Nancy Murphy
Alison Neplokh
Steve Broeckaert
Brendan Murray