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January 17, 2013

**ELECTRONIC FILING**

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

**Re: *Ex Parte*, CS Docket No. 97-80, PP Docket No. 00-67**

Dear Ms. Dortch:

This is to inform you that on January 15, 2013, Matthew Zinn, Senior Vice President, General Counsel, Secretary & Chief Privacy Officer, TiVo Inc. ("TiVo") and the undersigned met with the following Commission personnel: (1) Jonathan Chambers, Acting Chief, Office of Strategic Planning & Policy Analysis; (2) Commissioner Jessica Rosenworcel and Alex Hoehn-Saric, Policy Director for Commissioner Rosenworcel; (3) Matthew Berry, Chief of Staff to Commissioner Ajit Pai; and (4) Bureau Chief William Lake, Deputy Bureau Chief Michelle Carey, Nancy Murphy, Mary Beth Murphy, Brendan Murray, Alison Greenwald Neplokh, Steve Broeckaert, and Adam Copeland, all of the Media Bureau.

During these meetings, TiVo discussed the continued importance of the Commission's rules and policies under Section 629 of the Communications Act that allow retail set-top box and other navigation device manufacturers access to MVPD-provided signals, including the CableCARD rules. These rules continue to serve two main purposes. First, by setting a standard, the rules ensure that manufacturers can offer consumers innovative products and services secure in the knowledge that the devices will work across different MVPD systems. Second, the presence of the

CableCARD standard has also allowed for greater competition among manufacturers providing set-top boxes to cable operators and other MVPDs, leading to innovation and lower costs to operators and, in turn, to consumers. For example, the CableCARD standard has allowed TiVo to enter into deals with several smaller cable operators to supply operator-provided DVRs and/or DVR software to their subscribers.

TiVo also stressed the importance of enforcing the existing CableCARD rules. Since the Commission strengthened the CableCARD rules in 2010, TiVo's surveys of MSO compliance with CableCARD rules have shown generally increasing compliance – a sign that signaling continued FCC emphasis on enforcing CableCARD rules leads to greater compliance and furthers the goals of Section 629. Conversely, weakening CableCARD rules via waivers, lack of enforcement, or other means hurts innovation and retail choice, undercutting the Commission's policies.

Finally, TiVo discussed the growing use of IP signals in all forms of delivery of video to the home, and the need for a successor standard to CableCARD that ensures the continued availability of signals in an IP world.

Please direct any questions regarding this matter to the undersigned.

Respectfully,

A handwritten signature in black ink that reads "T. Devendra Kumar". The signature is written in a cursive style with a horizontal line underlining the name.

Henry Goldberg  
Devendra T. Kumar  
*Attorneys for TiVo Inc.*

cc: Jonathan Chambers  
Alex Hoehn-Saric  
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