

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of)	
)	
TiVo Inc.)	
Petition for Clarification or Waiver)	
of 47 C.F.R. § 76.640(b)(4))	CS Docket No. 97-80
)	
Implementation of Section 304 of the)	
Telecommunications Act of 1996;)	
Commercial Availability of Navigation)	
Devices)	

**COMMENTS OF
THE ALLVID TECH COMPANY ALLIANCE**

The Alliance supports member TiVo’s petition for clarification or waiver of Section 76.640(b)(4)(iii) of the Commission’s rules. It is important that FCC rules refer to a standards-based IP-technology for navigation devices to connect to home networks. As the Alliance commented in supporting TiVo’s initial waiver request, “[p]iecemeal approaches to interoperability and regulation by waiver are inadequate to fulfill all of the Commission’s responsibilities under Section 629.”¹ In supporting TiVo’s original petition the Alliance also referred to its concern, as stated in its comments on basic tier encryption, that the “transition to IP-based digital techniques is an opportunity that if not grasped now will become an obstacle.”²

¹ *In the Matter of TiVo Inc.’s Request for Clarification and Waiver of the Audiovisual Output Requirement of Section 76.640(b)(4)(iii); Implementation of Section 304 of the Telecommunications Act of 1996; Commercial Availability of Navigation Devices; Compatibility Between Cable Systems and Consumer Electronics Equipment*, MB Dkt. No. 12-230, CS Dkt. No. 97-80, PP Dkt. No. 00-67, DA 12-1910, Comments of AllVid Tech Company Alliance (“Alliance Comments”).

² *In the Matter of Basic Service Tier Encryption*, MB Dkt. No. 11-169, PP Dkt. No. 00-67, Reply Comments of the AllVid Tech Company Alliance, at 2 (Dec. 12, 2011).

The Alliance urged in its comments on the previous petition,³ and continues to urge, that in addition to taking action as requested by TiVo to clarify the Commission's expectations for compliance with Section 76.640(b)(4)(iii), the Commission should also commence a rulemaking to establish "AllVid" standards references for IP-level connection to MVPD interfaces generally. With respect to the instant petition, however, all that is necessary is for the Media Bureau to clarify whether compliance with Section 76.640(b)(4)(iii) is required, and if so, by what date.

Respectfully submitted,

ALLVID TECH COMPANY ALLIANCE

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³ Alliance Comments at 7.