

July 14, 2014

**VIA ELECTRONIC FILING**

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W.  
Washington, DC 20554

**Re: CS Docket 97-80, MB Docket 10-91**

Dear Ms. Dortch:

On July 14, 2014, Jordan Goldstein of Comcast Corporation, Matthew Zinn and Jeff Klugman of TiVo Inc., and Jonathan Friedman of Willkie Farr & Gallagher LLP spoke with the following Media Bureau staff about an agreement between the two companies that is intended to promote consumer choice and innovation in the video device marketplace: William Lake, Michelle Carey, Mary Beth Murphy, Nancy Murphy, Alison Neplokh, Steve Broeckaert, Brendan Murray, Jeffrey Neumann, and Adam Copeland. This agreement builds on a strong track record of cooperation between the two companies in providing voluntary, market-based solutions for our joint customers, including, for example, the delivery of video-on-demand (“VOD”) content to retail TiVo devices in Comcast markets.

Under the terms of the agreement, Comcast commits to continue to provide and support CableCARDs in retail devices notwithstanding the D.C. Circuit’s *EchoStar* decision last year vacating certain CableCARD rules. Comcast will ensure that all CableCARD-enabled devices will continue to have access to all linear channels in all Comcast markets.

Comcast also has agreed to work with TiVo on a two-way non-CableCARD security solution that will enable retail devices to access the full Comcast lineup of linear and VOD programming. Comcast will make such non-CableCARD solution available to other cable operators on commercially reasonable terms.

This agreement demonstrates that the marketplace is working to provide innovative device solutions for consumers to access MVPD services and thereby advance the Commission’s navigation device goals. Comcast is already delivering IP cable services to smartphones, tablets, and other customer-owned devices in the home in certain Comcast markets. Under the agreement, Comcast customers that wish to use TiVo retail devices to access all of Comcast’s cable-delivered video services will continue to have that option in the future using a non-CableCARD solution that will be supported in both TiVo retail and Comcast-supplied devices and can also be supported in other compatible customer-owned devices.

Ms. Marlene H. Dortch

July 14, 2014

Page 2

Please direct any questions regarding this matter to the undersigned.

Sincerely,

/s/ Jordan Goldstein

Jordan Goldstein  
Vice President, Regulatory Affairs  
Comcast Corporation

/s/ Matthew Zinn

Matthew Zinn  
Senior Vice President, General Counsel,  
Secretary & Chief Privacy Officer  
TiVo Inc.

cc: William Lake  
Michelle Carey  
Mary Beth Murphy  
Nancy Murphy  
Alison Neplokh  
Steve Broeckaert  
Brendan Murray  
Jeffrey Neumann  
Adam Copeland