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September 15, 2014

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, MB Docket No. 14-90

Dear Ms. Dortch:

This is to inform you that on September 11, 2014, Matthew Zinn, Senior Vice President, General Counsel, Secretary & Chief Privacy Officer of TiVo Inc. ("TiVo") and the undersigned met with the Commission staff listed in the attachment.

The purpose of the meeting was to discuss the current status of the Commission's CableCARD rules and related policies that enable retail device competition in the MVPD marketplace in accordance Section 629, and to discuss these issues in relation to the pending merger of AT&T and DIRECTV. Mr. Zinn discussed TiVo's perspective on the questions posed to AT&T and DIRECTV regarding the availability of retail set-top boxes that can be used on their respective MVPD systems,[1] and noted that these two MVPDs do not make CableCARDs (or equivalent separable

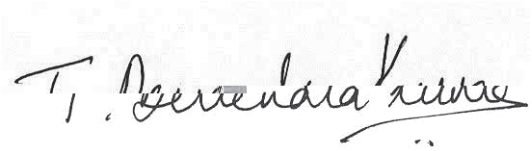
[1] *See* Letter from William T. Lake, Chief, Media Bureau, to Robert W. Quinn Jr., Senior Vice President - Federal Regulatory & Chief Privacy Officer, AT&T Services, Inc., MB Docket No. 14-90, September 9, 2014 (AT&T Information and Discovery Requests, Question 50); Letter from William T. Lake, Chief, Media Bureau, to Stacy Fuller, Vice President, Regulatory Affairs, DIRECTV, MB Docket No. 14-90, September 9, 2014 (DIRECTV Information and Discovery Requests, Question 47).

security) available, thereby preventing their subscribers from using retail set-top boxes. Mr. Zinn discussed the reasons DBS providers and IPTV systems have not been required to comply with device attachment and separable security requirements and noted that these reasons no longer apply in today's market with industry consolidation and technological convergence. Mr. Zinn also responded to several questions from staff regarding the merging companies' efforts to enable retail set-top boxes to be used with their systems as anticipated by Section 629.

In meetings with the Chairman's Office and the Media Bureau, Mr. Zinn also expressed his views on CableCARD and successor solutions to assure the availability of bidirectional video signals to retail devices pursuant to Section 629, and the importance of the CableCARD solution, which is fully realized today, remaining in place until then.

Please direct any questions regarding this matter to the undersigned.

Respectfully submitted,



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Julie Salovaara
Clarence Bush
Christopher Sova
Soumitra Das
Octavian Carare
Laura Yu
Eric Ralph
Bill Dever
Marilyn Simon
Clay DeCell
Susan Singer
Jack Erb
Paul LaFontaine

Commission Staff Attending Meetings with TiVo Inc., September 11, 2014

Meeting with Media Bureau

Michelle Carey
Mary Beth Murphy
Alison Neplokh
Brendan Murray
Steven Broeckaert
Jeffrey Neumann

Meeting with Chairman's Office

Maria Kirby

Meeting with Merger Review Team

Philip Verveer
Jamillia Ferris
Elizabeth Andrion
Virginia Metallo
Joel Rabinovitz
Jeffrey Neumann
Adam Copeland
Brendan Holland
Alison Neplokh
Wayne McKee
Sarah Whitesell
Alexis Zayas
Julie Salovaara
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