ATTACHMENT B

Access to Basic and Advanced Interactive Services:

Regulatory, Licensing and Testing Requirements

In order to allow CE and IT companies to manufacture differentiated, non-OCAP products designed to access basic interactive services, and to ensure that any OCAP-based products are consumer friendly and commercially viable, the Commission should require the following additions and modifications to the existing regulatory, licensing, and testing requirements applicable to digital cable compatible products and digital cable systems.

1. Navigation Device Functionality

    1.1. Conditional Access

        1.1.1. Permitted through a new version of the multistream (MS) CableCARD, or through a software-based solution, if/when available

    1.2. OCAP

        1.2.1. OCAP not required to enable device access to unidirectional and basic interactive services (e.g. switched digital, IPPV, EPG, VOD)

        1.2.2. Mandatory inclusion of a fixed version of OCAP ("OCAP Version X") to enable access to "advanced interactive services"

        1.2.3. OCAP-enabled devices required to support all OCAP applications delivered by service provider within product resource limits

    1.3. User Interface ("UI")

        1.3.1. Manufacturer UI required (by default) on devices that do not include OCAP

        1.3.2. In OCAP-enabled devices, manufacturer UI permitted for accessing unidirectional and basic interactive services

    1.4. Remote codes

        1.4.1. Controlled by manufacturer device, with mandatory provision of agreed key-codes to operational Cable UI/OCAP functions, if implemented

    1.5. Permitted outputs

        1.5.1. All outputs currently permitted under DCAS and CHILA licenses

     1.5.2. DTCP/IP carrying DLNA-compatible compressed video, as well as all current or future DLNA-approved digital output/protection technology

2. DVR

    2.1. In non-OCAP devices, manufacturer UI required (by default), with storage permitted of linear, SD, VOD, and IPPV content, subject existing encoding rules

    2.2. In OCAP-enabled devices, manufacturer UI permitted (see 1.3.2) but, when using manufacturer UI, can record only linear, and basic interactive content, subject existing encoding rules

    2.3. In OCAP-enabled devices with additional manufacturer UI, playback of all recorded content permitted from either UI

3. Networking

    3.1. Permitted in all devices, with or without OCAP

    3.2. DCTP/IP, and all other current and future DLNA-approved technologies, allowed (see 1.5.2 above)

    3.3. DLNA source (DMS) device functionality permitted

    3.4. All uni- and bi-directional video and associated navigation data available through home network connection

    3.5. Content protection technologies only approved or disapproved based on their ability to protect content, prevent harm to network and theft of service, and not disapproved based on otherwise unrelated requirements (e.g. quality of service, inclusion of OCAP in downstream devices)

    3.6. Downstream devices

        3.6.1. DLNA sink (DMR, DMP) device functionality permitted

        3.6.2. OCAP permitted but not required

    3.7. Cable Operator Leased set-top device

        3.7.1. Device that includes DLNA-compatible output made available on customer request.

4. Software-based conditional access

    4.1. License and all underlying technology for current DCAS proposal must be made available for public review, other than cryptographic secrets

4.2. Mandatory implementation through a secure, non-proprietary hardware requirement

4.3. If/when implemented, software-based conditional access must permit use with non-OCAP devices, consistent with this proposal

4.4. Mandatory unaffiliated root/trust authority (e.g. Verisign)

5. Metadata

    5.1.1. Translation to standardized format permitted through MS-CableCARD or software conditional access for non-OCAP devices, or OCAP-based translator for OCAP-enabled devices

6. Enforcement

6.1. Mandatory support for MS-CableCARD, consistent with this proposal, on every headend of every 550 MHZ or greater cable system by January 1, 2008.

6.2. Mandatory deployment of OCAP Version X on every headend of every 550 MHz or greater cable system by January 1, 2009.

6.3. Mandatory support for OCAP Version X, including deployment of OCAP Version X compatible applications to access switched digital, EPG, VOD and PPV, absent an FCC order specifying a successor version.

6.4. Mandatory support for software conditional-access technology, consistent with this proposal, on every headend of every 550 MHZ or greater cable system by January 1, 2009.

6.5. Common reliance

    6.5.1. Between 01/01/2008 and either 01/01/2009 or deployment of software conditional access technology, whichever comes last:

- Substantial percentage of newly deployed cable devices must use new version MS-CableCARD, as defined in this proposal

- Substantial percentage of newly deployed cable devices must use OCAP Version X, as defined in this proposal

    6.5.2. After 01/01/2009 or deployment of software conditional access technology, whichever comes last:

- Substantial percentage of newly deployed cable devices must use new version MS-CableCARD, as defined in this proposal

- Substantial percentage of newly deployed cable devices must use identical software conditional access technology, as defined in this proposal

- Substantial percentage of newly deployed cable devices must use OCAP Version X, as defined in this proposal

7. Certification Process/Testing

   7.1. Devices

      7.1.1. After successful certification of 1 device by CableLabs, optional self-certification by device manufacturer

      7.1.2. Mandatory single certification test suite for all digital cable devices – both manufacturer- and operator-provided

   7.2. Applications

      7.2.1. Mandatory release of all cable-provided OCAP applications to a cable-funded central test facility for optional compatibility testing by device manufacturers, no less than 60 days before deployment
      7.2.2. Narrow exception to the 60-day pre-release requirement for bona-fide field test

   7.3. Headends

      7.3.1. Mandatory self-certification by cable operators of compatibility with OCAP Version X and, if/when applicable, software conditional access technology, for each 550 MHZ or greater headend through a single, jointly devised test suite.

8. OCAP and software conditional access Specifications

   8.1. CableLabs defines OCAP Version X and software conditional access technology through the OpenCable process, but consistent with this proposal

   8.2. Supermajority of CE manufacturers with products in the market (not just licensees) must approve any subsequent changes to the OCAP Version X software conditional access specifications.

9. Bug fix path

   9.1. Cable-supplied software upgrade path equal to their own solely for bug-fixes and cable-related functionality upgrades.

   9.2. Alternative bug-fix methods not prohibited or restricted.