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October 19, 2007

VIA ELECTRONIC FILING

Marlene H. Dortch
Secretary
Federal Communications Commission
Office of the Secretary
445 12th Street, S.W.
Washington, D.C. 20554

Re: CS Docket No. 97-80
Ex Parte Presentation

Dear Ms. Dortch:

On October 17, 2007, representatives from the Alliance for Telecommunications Industry Solutions (ATIS) Incubator Solutions Program 5 – IP-based Separable Security (AISP.5-ISSI) met with representatives from the Federal Communications Commission’s Media Bureau. The purpose of the meeting was to update the FCC on the efforts of AISP.5-ISSI in developing two IP-based separable security solutions that are relevant to and consistent with the objectives of the above-referenced docket.

In attendance, representing the Media Bureau were: Thomas Horan, Chief of Staff; Jeffrey Newmann, Electronics Engineer; Brendan Murray, Attorney Advisor; Alison Neplokh, Electronics Engineer; Steven Broeckert, Senior Deputy Chief, Policy Division; Mary Beth Murphy, Chief, Policy Division; Michael Lance, Deputy Chief, Engineering Division and John Wong, Chief, Engineering Division.

The individuals representing the AISP.5-ISSI at this meeting were: Michael Nawrocki, Director, Standards and Regulatory, Verizon Technology; Robert Glidden, Global Analysis Manager for TV and Media, Sun Microsystems; Brian Lee, Senior Director, Business Development & Advanced Technology, LG Electronics USA; James Turner, Technical Coordinator, ATIS; Deirdre Cheek, Attorney, ATIS; and Thomas Goode, General Counsel, ATIS.

October 19, 2007
Page 2 of 2

The discussion at the meeting was consistent with the presentation that is enclosed with this letter. Pursuant to Section 1.1206(b)(2) of the Commission's rules, one copy of this letter is being filed electronically for inclusion in the public record of the above-referenced proceeding.

Sincerely,

A handwritten signature in cursive script, appearing to read "Deirdre Y. Cheek".

Deirdre Y. Cheek
Attorney

Enclosure

**ATIS Incubator Solutions
Program #5 – IP-Based
Separable Security
Incubator
(AISP.5-ISSI)**

Meeting Agenda

- Overview of ATIS
- Discuss mission and scope of ATIS' IP-based Separable Security Incubators
- Q&A

ATIS Background

- Established in 1983, an accredited technical planning and standards development organization.
- Committed to rapidly developing and promoting technical and operations standards for the communications and related information technologies industry worldwide.
- Uses a pragmatic, flexible, open, and market-driven approach to develop end-to-end, implementable, interoperable standards and solutions.
- 300+ ATIS member companies represent a wide cross section of the global communications industry.
 - Local Exchange Carriers
 - Interexchange Carriers
 - Wireless Equipment Manufacturers
 - CLECs
 - Wireless Providers
 - CMRS Providers
 - Broadband Providers
 - Software Developers
 - Consumer Electronics Vendors
 - Digital Rights Management Companies
 - Central Authentication Services Companies
 - Internet Service Providers

About ATIS

- 23 Industry Standards Committees and Forums provide end-to-end solutions for key components of communications industry:
 - Network Architecture and Interconnection
 - Optical Transport and Synchronization
 - Operations, Administration, and Maintenance
 - Ordering, Billing and Provisioning
 - Information and Data Security
 - IPTV Interoperability
- ATIS Incubator Solutions Program:
 - Provides an alternate approach with innovative, focused, problem-solving environment to fast track solutions with little to no impediment.

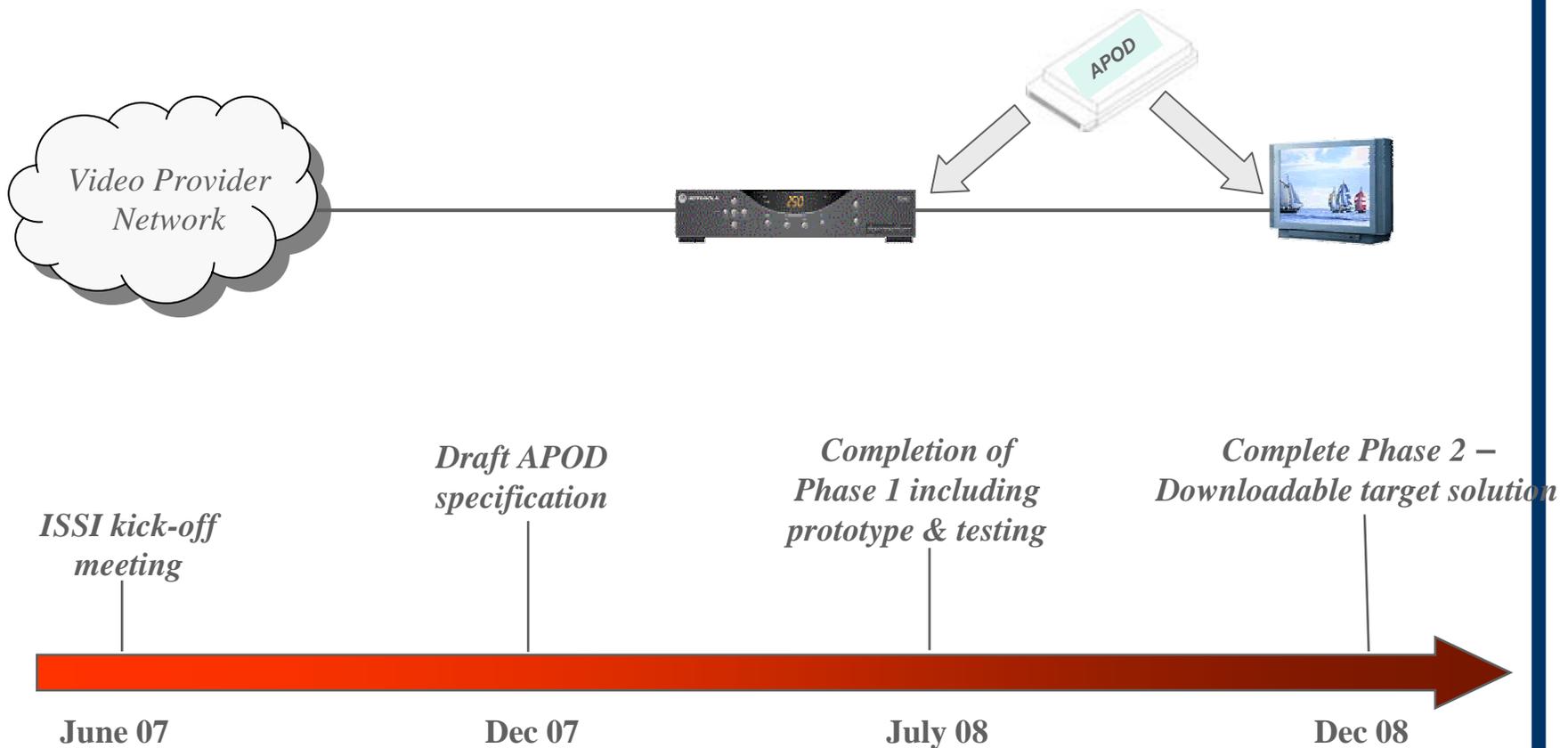
ATIS' ISSI

- ATIS' IP-based Separable Security Incubator (AISP.5-ISSI) was established in June 2007
- AISP.5-ISSI scope addresses two solutions to meet FCC objectives for separable security
 - Enhance use of existing Host/POD design
 - Create an open standard for downloadable security functionality
- APOD solution enables harmonizing IP and QAM delivered content over M-card design approach
- Downloadable approach viewed as longer term solution
- Leverages work being done in the IIF

AISP.5-ISSI Members

- Hitachi Telecom (USA), Inc.
- LG Electronics MobileComm U.S.A, Inc.
- Microsoft Corporation
- Nagravision
- NDS, Ltd.
- Nortel Networks
- Philips (Pending)
- Pioneer (Pending)
- Samsung Telecommunications America
- Scientific Atlanta, a CISCO Company
- Sony Electronics
- Sun Microsystems
- Verimatrix, Inc.
- Verizon
- ViXS (Pending)
- Widevine Technologies

ISSI Project Timeline



ATIS ISSI – Solution I Enhancements to Existing HOST/POD

- Provides backward compatibility with UDCR and M-card devices
- Uses same physical/electrical form factor as M-card
- Maps IP flows between HOST and APOD
- Is network agnostic to layer 1 and 2 transport
- Supports IPTV and hybrid network implementations
- Supports advanced services (IPG, IPPV, VOD)
- Supports command channel and extended data channel modifications
- Supports copy protection of content
- Target completion date July 2008

ATIS ISSI – Solution II Downloadable Security Functionality

- Fosters an open standards approach for a downloadable conditional access system (DCAS)
- Leverages and supports the work of ATIS' IPTV Interoperable Forum (IIF)
 - ATIS' IIF develops ATIS standards and related technical activities that enable the interoperability, interconnection and implementation of IPTV systems and services, including video on demand and interactive TV services.
- Supports the Digital Video Broadcasting Common Scrambling Algorithm (DVB CSA)
- Target completion of feasibility study is December 2008.

Benefits of AISP.5-ISSI work

- Promotes consumer freedom of choice for device attachment
- Fosters competitive landscape for service providers
- Supports IPTV services, but network agnostic to layer 1 and layer 2 transport
- Harmonizes with ATIS IIF standards and other relevant industry specifications and standards
- Promotes multi-CAS solution
- Maintains a high level of copy protection robustness
- Creates a working prototype, i.e. physical example of hardware solution

Benefits of AISP.5-ISSI work

ISSI provides a common “separable security” platform for the delivery of present and future IP-based services to consumers!

Questions?

LIST OF ATTENDEES

- Thomas Goode, ATIS General Counsel
- James Turner, ATIS Technical Director
- Deirdre Cheek, ATIS Staff Attorney
- Mike Nawrocki, Verizon, Chair of AISP.5-ISSI
- Robert Glidden, Sun Microsystems
- Brian Lee, LG Electronics