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**VIA ELECTRONIC FILING**

Ms. Marlene Dortch, Secretary  
Federal Communications Commission  
445 12th Street, SW  
Washington, D.C. 20554

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

Dear Ms. Dortch:

The 1394 Trade Association (1394 TA) hereby provides an initial response to various *ex parte* letters filed recently by Intel regarding the interfaces on cable set top boxes (STBs).

Pursuant to 47 C.F.R. §76.640(b)(4), a cable operator is required to include a functional IEEE 1394 interface on high definition set-top boxes provided to consumers. In its *ex parte* letters, Intel suggests that “[g]iven the marketplace acceptance of IP, ... this regulation should be amended so as to make mandatory instead the availability of an IP-based interface that facilitates home networking, such as Ethernet, in those products. ”

This suggestion is surprising, because IEEE 1394 already provides complete IP services as specified by IETF RFC 2734 (IPv4 for 1394), supported by RFC 2855 (DHCP for 1394) and RFC 3146 (IPv6 for 1394). Many personal computers and other devices sold today include support for IP on 1394. Source code for IP on 1394 is widely available. The IP service in 1394 has been adopted by television industry standards such as CEA-2027B to support rich home networking services.

It is widely known that 1394 is highly capable of home networking, using the same Category 5 cables as Ethernet, and supporting many other cable options including shielded twisted-pair and optical fiber. 1394 can also be carried on residential-grade coaxial cable and splitters in full co-existence with established analog and digital Cable TV systems, using standards recently completed by the 1394 Trade Association. Set-top boxes and HDTVs with IEEE 1394 employ DTCP content protection.

Consequently, the "IP-based interface that facilitates home networking" suggested by Intel is already available in the form of IEEE 1394. As a result, there is no need to modify the

Commission's rules. The cable industry has widely deployed set-top boxes with 1394 to consumers, who will gain nothing from "starting over" with a different interconnect, such as Ethernet, that offers no fundamental technical advantages over 1394.

Respectfully submitted,



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