

NCTA's initial comments explained why the Copyright Act should be interpreted to allow cable operators, during the interim period prior to return of the broadcasters' analog spectrum, to carry distant digital signals along with distant analog signals without paying more in

I. THE COPYRIGHT ACT DOES NOT REQUIRE ADDITIONAL ROYALTY PAYMENTS FOR CARRIAGE OF DISTANT DIGITAL PROGRAM STREAMS

The Copyright Office ("Office") initiated this proceeding in response to a Copyright Owner Petition seeking guidance on how the rules and policies adopted pursuant to the Section 111 cable compulsory license apply to cable carriage of digital broadcast signals.¹ In general, the cable industry and Copyright Owners agree with the Office's conclusion that the compulsory license covers the retransmission of digital broadcast signals. However, as discussed below, we part company with the Copyright Owners Comments over how the royalty rules should apply to cable carriage of digital broadcast signals during this interim transition period.

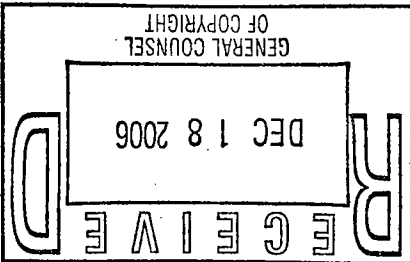
DISCUSSION

The National Cable & Telecommunications Association ("NCTA"), by its attorneys, hereby submits its Reply Comments in the above-captioned proceeding.

REPLY COMMENTS OF THE NATIONAL CABLE & TELECOMMUNICATIONS ASSOCIATION

Retransmission of Digital Broadcast Signals) Pursuant to the Cable Statutory License)
Docket No. RM-2005-5)

Before the
COPYRIGHT OFFICE
LIBRARY OF CONGRESS
Washington, D.C.



Id. at 5. (“Once again, the existing rules should be applied without reference to broadcast format. Each signal operator carries a digital signal with two program streams, the primary stream may have grandfathered status while the additional stream does not.”)

Id. at 4.

Comments of the Copyright Owners at 4-5.

NCTA Comments at 4-7. One broadcast commenter agreed. *See* Comments of Capitol Broadcasting Company, Inc. at 2 (“To the extent that a broadcaster operates both analog and digital channels that broadcast the same programming, there should not be a separate copyright fee for each channel. At such time as the analog television license is surrendered, the copyright fee is to be applicable to the remaining digital television license.”)

carriage of each digital stream would have been accorded grandfathered status,⁵ and to establish

24, 1981.”⁴ They also propose that individual determinations should be made about whether

separately to determine if it would have been permitted under Commission rules in effect on June

broadcast format; rather each signal and each stream of a multicast signal should be evaluated

argue that “no discrimination should be made in the application of the existing rules based on

determination of the permitted/non-permitted status of each digital programming stream. They

The fundamental approach embraced by the Owners would require a separate

or the Office’s rules.

justify this formulation – which would lead to inflated and unfair copyright fees – under the Act

establishing the royalty rates that would be owed.³ Copyright Owners do not even attempt to

digital signal during this transition period. Moreover, they devise a complicated formula for

discussion or support, that cable operators should pay additional royalties for importing a distant

The Copyright Owners, however, take a different view. They assume, without any

transmitted by the same broadcaster using a different technology.²

version of that broadcast station, it should not have to pay again to import the same programming

scheme are best read to provide that where a cable operator already pays to import an analog

copyright fees. NCTA’s initial Comments showed that the Act’s definition and royalty fee

This would result because determining whether a distant station is "permitted" or "non-permitted" under the Copyright Office rules hinges on its status under the FCC's former distant signal rules. 37 C.F.R. §201.17. Those rules allowed operators to import a set number of distant stations to make up particular complements of stations, depending on the size of the market in which the system was located. See *Cable Television Syndicated Program Exclusivity Rules*, 48 R.R.2d 171 (1980). Those rules also afforded individual stations grandfathered status and waivers in particularized cases.

⁶ *Id.* at 4-5.

demonstrate the wisdom of adopting a simple approach based on the best reading of the Act: a

At bottom, the Copyright Owners' complicated royalty formulation only serves to

national goal of a smooth transition to digital.

by the language of the Act or the Copyright Office's existing rules, and entirely detrimental to the

separate distant digital stream. That would be an extreme and punitive approach, not warranted

of an otherwise "permitted" station. Royalty fees of 3.75% would thus attach to carriage of each

"permitted" analog signal, it would still deem "non-permitted" all other digital multicast streams

their proposal could be understood to consider "permitted" a simulcast digital signal of a

period in cases where analog stations already make up the quota of "permitted" signals. Even if

— and therefore subject to the 3.75% penalty rate — all distant digital carriage during this interim

signals.⁷ The result of the Copyright Owners' approach, then, would be to deem "non-permitted"

likely have already filled up their quota of "permitted" distant signals with distant *analog*

version of an analog distant signal. But consider how it would work if it did: most cable systems

virtually all cases to date of which we are aware, a cable operator carries a simulcast digital

The Copyright Owners never specify whether this formulation would apply where, as in

analog and digital carriage — and unintended consequences.

equivalent of an analog broadcast station leads to absurd results during this interim period of

royalty purposes.⁶ An approach that treats each individual digital stream as if it were the

whether each particular stream should be considered a network or an independent station for

reading that confirms that Section 111 does not provide for additional royalty payments for

carriage of distant digital signals where the operator already pays to import that station's analog signal. When the Copyright Act does not anticipate double payment and where voluntary

carriage of digital programming serves an important national policy interest, the Office should

avoid stepping in to create this roadblock.

II. COPYRIGHT OWNERS MISUNDERSTAND CABLE OPERATORS' MARKETING OF DIGITAL BROADCAST SIGNALS

NCTA's initial Comments explained that cable operators for the most part market digital

broadcast signals in the same manner and on the same tier as analog broadcast signals – that is, as part of their basic tier offering. High definition ("HD") broadcast signals are typically available

free of charge to any customer to the basic tier who has the equipment to receive them. Cable operators pay royalties based on gross receipts from this tier. Copyright Owners, however,

highlight some selected language from a handful of cable system websites and Statements of Account ("SOA") in an effort to try to bolster their claim that "subscribers are required to

purchase other tiers or packages in order to access digital broadcast signals, yet those 'buy through' tiers do not appear to be reflected in Space B of the cable systems' SOAs...."⁸

However, the Copyright Owners' assumptions about cable marketing practices for digital broadcast signals are not supported by their selective references to certain material taken out of

context.

Copyright Owners misinterpret the provision of digital broadcast signals in several

instances their comments cite. As one example, they point to various charges for HD

⁸ Comments of Copyright Owners at 7.

9 Attachment C to Copyright Owner Comments.
 10 Exhibit A hereto.
 11 Exhibit B hereto contains marketing materials for that system which shows that local HD broadcast channels are “FREE with your HD Basic Service.”

show otherwise.

Francisco area.) Copyright Owners have taken marketing material out of context in trying to (CBS), KGO (ABC) and KQED (PBS). (Exhibit D contains Comcast’s rate card for the San customers to access digital versions of KTVU (FOX), KNTV (NBC), KRON (ND), KPIX

Contrary to the Copyright Owners’ assertion, no digital gateway or other charge is assessed for Copyright Owners – also provides HD broadcast signals as part of its basic service subscription. Exhibit C hereto.) And Comcast in the San Francisco metropolitan area – also singled out by free to basic cable-only subscribers who own an HDTV equipped with a QAM tuner.” (See BendBroadband’s attached channel line-up card makes clear, “broadcast HD channels are also filing, offers HD broadcast signals *without additional charge* to its customers. As

For example, BendBroadband, referenced in Attachments G and H of the Copyright Owner Copyright Owners jump to the wrong conclusion about several other copyright filings.

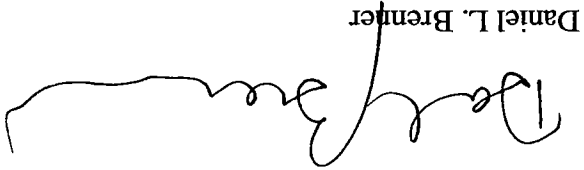
customers with an HD receiver.”¹¹

that system, too, offers unencrypted HD broadcast channels that are available to basic cable WETA. Copyright Owners also reference the Cox Palos Verdes, California website. However, obtain the HD broadcasts of ABC (WJLA), NBC (WRC), Fox (WTTG), CBS (WUSA), and customers of Cox Cable’s Fairfax system, there is “*no additional charge* with an HD receiver” to demonstrates the opposite of the Copyright Owners’ claim. As that document states, for programming and services offered by Cox Cable in Fairfax, Virginia.⁹ But that Attachment¹⁰

To be sure, there may be instances where HD broadcast signals are marketed in a way different than the norm. During this interim period where only select customers have the equipment to view these signals, cable operators may have experimented with different types of service offerings. However, if the Copyright Office adopts rules that impose additional royalty fees based on how digital broadcast signals are marketed – and during this transition, that would be a mistake – it must apply those rules prospectively. As the D.C. Circuit has found, “Agencies do not have authority to promulgate retroactive rules unless Congress gives them that authority in express terms.... The Copyright Act does not contain such express terms.... A rule promulgated by the Office can only be prospective.”¹² Doing so not only is necessary and proper under the Office’s authority, but it also would avoid penalizing cable operators for rolling out HD broadcast signals in an uncertain environment.

During this interim period when a broadcast station is transmitting programming using two different technologies, there may be instances where a cable operator transmits both the analog and digital signals from a distant station. However, Congress did not assign different royalty payments to such transmission. The Copyright Office should refrain from adopting a royalty scheme along the lines of that proposed by Copyright Owners.

Respectfully submitted,



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December 18, 2006

CERTIFICATE OF SERVICE

I, Gretchen M. Lohmann, a secretary with the National Cable & Telecommunications Association, hereby certify that a copy of the foregoing Reply Comments was served via first-class U.S. mail, postage prepaid, on this 18th day of December, 2006, to the following:

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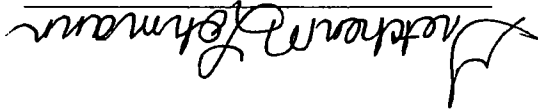

Gretchen M. Lohmann

EXHIBIT A

Digital Tier	Description	Monthly Rate
Movie Tier	10 channels of digital movies including IFC, Sundance, Lifetime Movie Network, We, & Encore channels specializing in westerns, love stories, mystery, action, and true stories.	\$2.00/mo
Variety Tier	26 channels of variety with something for everyone including LOGO, VH1 Soul, MTV, Jams, PBS Kids Sprout, Style Network, Nicktoons, Nick GAS, MTV Hits, VH1 Classics, VH1 Country, Game Show Network, Toon Disney, Fuse, BET on Jazz, Encore WAMI, Soap Net, Ovation, BBC America, The History Channel International, The Hallmark Channel, Fine Living, Boomerang, TV ONE, American Life TV, The Biography Channel and Reality TV.	\$2.00/mo
Sports & Info Tier	15 channels of news and sports programming including Fox Sports World, The Golf Channel, ESPN News, ESPN Classic, Outdoor Life Network, Bloomberg, CNN International, International Channel, NBA TV, DIY - Do It Yourself Network, G4/TechTV, Tennis Channel, WKTV, FIT TV and NFL Network.	\$2.00/mo
Discovery Tier	14 channels of quality Discovery programming including Discovery Times, Discovery Home, Discovery Kids, The Science Channel, Discovery Wings, Noggin,	Free with any Tier

Check out our **Special Offers** on Cox Services

EASYPAY

Sign up here for an easier way to pay

Pay-Per-View	Rate
PPV Movies*	\$4.99 each
PPV Special Events	Varies

Cox Family Package (CFP)	Monthly Rate
Includes limited basic and 15 channels of programming effectively rated "G" and suitable for family (receiver not included)	\$33.99

Analogue Services	Monthly Rate
Basic Service	\$17.99
Expanded Basic Service (includes basic service)	\$43.99
Analogue receiver with Remote	\$3.99
Service Assurance Plan	\$3.99/mo
TV Guide (optional weekly magazine)	\$3.99/mo

- Home
- Order now
- Cable
- Digital cable
- Special offers
- Channel lineups
- Pricing
- Premium channels
- Paquete Latino
- Self install
- DigitalCable-PPV
- Digital video recorder
- HD service
- High-speed internet
- On Demand
- Digital telephone
- Customer support
- Press center

RATES

Printer Friendly Rates Brochure



For Home | For Business | Order Services | View / Pay Bill | Customer Support | About Cox | Find service in your area

COX COMMUNICATIONS

Your friend in the Digital Age

Need a password? Forgot

Login to view/pay your bill

Monthly Rate	Digital International Premium Services
\$12.95	Arab Radio and TV (ART)
\$14.99	ZEE TV (Hindi & Indian/South Asian Programming)
\$14.95	TV Asia
\$24.95	ZEE TV + TV Asia
\$11.95	The Filipino Channel (TFC)

Monthly Rate	On DEMAND Subscription Channels
\$6.99/mo	WWE 24/7
\$6.99/mo	Anime
\$6.99/mo	here!
\$13.99/mo	Howard Stern
	HBO On Demand (included w/HBO subscription)
	Cinemax On Demand (included w/Cinemax subscription)
	Starz On Demand (included w/Starz subscription)
	Showtime On Demand (included w>Showtime subscription)

Monthly Rate	Digital Premium Services
	- HBO (9 channels)
	- Showtime (7 channels)
	- Starz (6 channels)
\$13.99/mo	1 premium channel
\$21.99/mo	2 premium channels
\$29.99/mo	3 premium channels
\$37.99/mo	4 premium channels

*Digital Receiver required.

Monthly Rate	Digital Services
\$6.95*	Digital Gateway (required for digital service) Includes Interactive Program Guide (IPG), 46 Digital Music Choice Channels, plus access to digital pay-per-view, premium & digital service tiers.
\$5.95*	Each additional Digital outlet

Monthly Rate	Paquete Latino
\$30.93	Includes Digital Gateway and equipment, limited basic service and 23 channels of Hispanic programming and 5 digital music channels.

	NASA, Jewelry TV, America's Collectible Network, National Geographic, EWTN, TBN, TV Guide and WeatherScan (Local Radar).
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Cox High Speed Internet Service	Preferred High Speed Internet
Monthly Rate	

DVR Service	DVR service (equipment not included)
Monthly Rate	\$9.99*

High Definition (HD) Services	<ul style="list-style-type: none"> - Customers will need an HDTV-capable or HDTV-ready set and an HDTV receiver from Cox to receive HDTV. - Customers must also subscribe to Cox Digital Cable. - Some televisions sold previously as HD sets only feature a 720 signal. These sets aren't compatible with Cox's HDTV service, which requires a 1080i signal.
Discovery HD Theater	Must subscribe to Expanded Basic Service, Digital Gateway
HBO HD	Included with current Digital HBO subscription
SHOWTIME HD	Included with current Digital Showtime subscription
Starz HD	Included with current Digital Starz subscription
ABC HD (WJLA)	No additional charge w/ HD receiver
NBC HD (WRC)	No additional charge w/ HD receiver
Universal HDTV	Must subscribe to Expanded Basic Service, Digital Gateway
FOX HD (WTTG)	No additional charge w/ HD receiver
CBS HD (WUSA)	No additional charge w/ HD receiver
ESPN HD	Must subscribe to Expanded Basic Service, Digital Gateway
INHD1	Must subscribe to Expanded Basic Service, Digital Gateway
INHD2	Must subscribe to Expanded Basic Service, Digital Gateway
WETA HD	No additional charge w/ HD receiver
TNT HD	Must subscribe to Expanded Basic Service, Digital Gateway
Monthly Rate	No additional charge w/ HD receiver

Saigon Broadcasting Network (SBN)	\$14.99
Bridges TV	\$14.99

\$41.99	NOW - Download up to 5Mbps and upload up to 2Mbps! Up to 3.3x faster than Verizon DSL**
\$56.99	Premier High Speed Internet Faster than Preferred! NOW - Download up to 15Mbps and upload up to 2Mbps! Up to 10x faster than Verizon DSL** McAfee Web Essentials - Included with Premier Package
\$26.99	Value Tier (Call 703.378.8422 to Order)
\$6.95 each	Additional IP Address (maximum: 3)
\$15.00	Modem Rental
\$3.99	Service Assurance Plan
*Cable modem rental or purchase required **Speed comparison based upon maximum download speeds of Cox Preferred 5Mbps and Cox Premier 15Mbps versus Verizon 1.5Mbps and 28.8k dial-up.	
	Cox High Speed Internet Service Installation Charges
	Rate
\$99.99	High Speed Internet Full Professional Installation
No Charge	High Speed Internet Self Installation
\$74.99	High Speed Internet unsuccessful Self Install
\$129.98	High Speed Internet & Cable Installation

Home Networking	
Monthly Rate	\$3.99
Home Networking Service Assurance	

Equipment	Rate
Digital receiver & remote	\$3.99*/mo
Additional digital outlets receiver & remote	\$3.99*/mo
High-definition (HDTV) receiver**	\$9.99/mo
DVR receiver (DVR & Digital service required)	\$3.99*/mo
HD/DVR receiver (DVR & Digital service required)**	\$9.99*/mo
Home Networking wireless router and equipment for 2 personal computers (additional install charges of \$99.95 not included -see Installation/One-Time Charges below-)	\$199.95
Home Networking equipment for additional Computers (3rd and/or 4th)	\$49.95
Cox One-Way Digital Plug-and-Play Cable Card™	Monthly Rate
More Cable Card information	\$1.99

**Requires Digital Gateway to receive service (\$6.95 additional)*
 **Cox Northern Virginia responded to customer feedback, which indicated that HD subscribers prefer the convenience of leasing an HD receiver monthly to purchasing one at a substantial expense. Since new Cox HD customers must now lease their HD receiver - in-effect since September 22nd, 2003, third party retailers such as Best Buy have chosen to no longer sell the receiver. If you already own an HD receiver, you may continue to use it.

Charge	Lost Equipment
\$4.27	Cox remote control
\$40.00	GI analog receiver
\$36.50	Cox cable modem
\$352.00	SA digital receiver (Model SA 8300 SD)
\$165.50	SA digital receiver (Model SA 3250 SD)
\$408.00	HDTV receiver (Model SA 8300 HD)
\$230.00	HDTV receiver (Model SA 3250 HD)
\$375.00	DVR receiver
\$431.00	HD/DVR receiver
\$466.00	Multi-Room HD/DVR receiver
\$400.00	Multi-Room DVR receiver
\$80.00	CableCARD™
\$40.00	Basic non-addressable receiver

Rate	Installation/One-Time Charges
\$29.99	New Service/Transfer Standard Installation (primary outlet)
\$41.99*	Service Call Charge
\$29.99	CableCARD™ Installation and activation
\$10.00	Additional Outlet Installation (during initial install visit)
\$19.99	Additional Outlet Installation (separate visit)
\$19.99	Relocate Outlet (video or high-speed Internet)
\$5.95	Additional Outlet Kit
\$44.99	Wall-fish charge (per wall, floor or ceiling each)
No Charge	Digital Self Installation
\$19.99	Digital Self Installation 2nd Trip Charge
\$19.99	Digital Upgrade (current non-digital customers only)
\$10.00	Additional Digital Outlet Installation (same visit)
\$19.99	Digital Downgrade (to analog service - trip charge)
\$5.00	Programming/Service Change (electronic)
\$19.99	Programming/Service Change (trip required)
\$1.99	Account Reconnection (electronic)
\$19.99	Account Reconnection (trip required)
\$19.99	Relocate Outlet

High Definition Installation for existing Cox customers (trip charge)	\$19.99
High Definition Installation for new Cox customers	\$29.99
DVR Installation for existing Cox customers (trip charge)	\$19.99
DVR Installation for new Cox customers	\$29.99
Home Networking wireless installation for 2 PCs	\$99.95**
Home Networking installation for each additional PC	\$49.95**
Account Reconnection (electronic)	\$1.99
Account Reconnection CHSI/Cable (trip required)	\$19.99
Vacation Disconnect	\$10.00 per mo.
Late Payment Fee	\$5.00
Declined Credit Card	\$35.00
Returned Check Charge	\$35.00
Franchise, PEG fees & other costs paid to local governments	8.26% of total bill + .26 cents

*\$41.99 Service call charge may apply to non-CSAP customer; fee is waived if service issue is related to Cox equipment. Digital service required. Rates and programming subject to change. **Must purchase equipment from Cox Communications.

EXHIBIT B



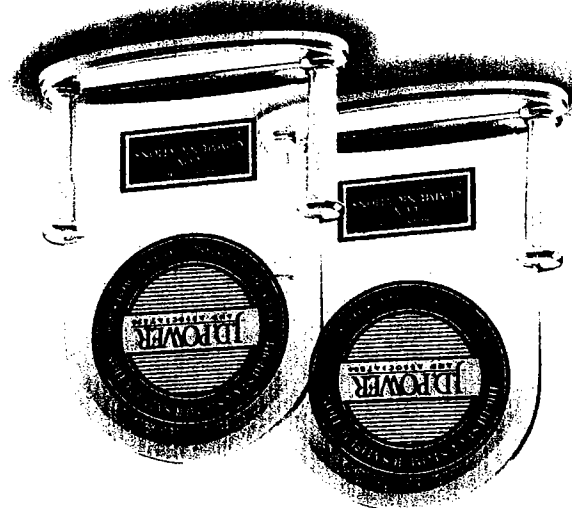
Why connect with Cox Communications?

Because we keep it simple. With Digital Cable, High Speed Internet and Telephone service, there's no need to hassle with multiple service providers. Cox gives you a single reliable source for all your digital services.

What's in it for you?

- Cox provides a comprehensive package of communications services, offering superior choice, convenience and value.
- The more Cox services you have, the more you'll save with the **Cox Connections Bundle**.
- Cox Digital Cable is now better than ever with 100% digital picture and sound.
- Exclusive local programming from Cox3.
- All from one provider with the convenience of one bill.

"Highest in Residential All-Distance Telephone Customer Satisfaction in the West Region"



"Highest in Customer Satisfaction Among Cable/Satellite TV Subscribers in the West Region"

See who measures up before you connect!



Digital Cable

On DEMAND on Channel 1	YES	No
HD and DVR with no equipment to buy	YES	No
Free Standard Cable Service on extra TVs*	YES	No
Clear reception without rain fade	YES	No

High Speed Internet

Download speeds up to 12 Mbps**	YES	No
No long-term contract required	YES	No

Telephone

75% larger local calling area	YES	No
Satisfaction guaranteed***	YES	No
Free activation on first line***	YES	No

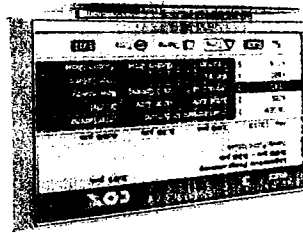
* Free Standard Cable Service on standard setups applies when you subscribe to Cox Standard Service on your primary outlet. ** 12 Mbps speed with former service plan. **/Month/line. Service activation covers the first month's charges on the primary line only; existing local and long distance charges, inside wiring and installation of additional outlets, taxes, and surcharges. Free service activation applies to Cox Communications' residential service providers in the West in the following states: AZ, CA, CO, HI, IL, IN, MI, MN, MO, NE, NY, ND, OR, SD, UT, WA, WI, and various portions of consumers who received the local and long distance service from one provider. ***Cox Communications' satisfaction survey results are based on responses from a national survey of residential service providers in the West in the following states: AZ, CA, CO, HI, IL, IN, MI, MN, MO, NE, NY, ND, OR, SD, UT, WA, WI, and various portions of consumers who received the local and long distance service from one provider. **/Month/line. Service activation covers the first month's charges on the primary line only; existing local and long distance charges, inside wiring and installation of additional outlets, taxes, and surcharges. Free service activation applies to Cox Communications' residential service providers in the West in the following states: AZ, CA, CO, HI, IL, IN, MI, MN, MO, NE, NY, ND, OR, SD, UT, WA, WI, and various portions of consumers who received the local and long distance service from one provider. ***Cox Communications' satisfaction survey results are based on responses from a national survey of residential service providers in the West in the following states: AZ, CA, CO, HI, IL, IN, MI, MN, MO, NE, NY, ND, OR, SD, UT, WA, WI, and various portions of consumers who received the local and long distance service from one provider.

The Cox Interactive Program Guide

More info—more control!

The Cox Interactive Program Guide puts you in complete control so you'll never miss your favorite show.

- Search by time, theme or title.
- Advanced Parental Control features let you decide who watches what and when.
- Know what's on every channel, days in advance.
- Select future program viewing, or set an event timer.
- View program ratings.
- movie synopses.
- starting cost
- members and release dates.



Cox Digital Premium Multiplex Movie Channels

HBO THE WORKS Up to 13 channels Plus HBO On Demand
CLIMATE MULTIMAX Up to 10 channels Plus Climate On Demand
SHOWTIME UNLIMITED Up to 10 channels Plus Showtime On Demand
STARZ SUPER PAK Up to 10 channels Plus Starz On Demand

International Channels

TM Japanese \$24.95/month
RAI Italian \$11.95/month
CTV-4 + **中天頻道** Mandarin \$14.95/month
South Asian \$14.95/month

Channel Lineup
 Cox Digital Premium Multiplex Channels are available in select markets. For more information, visit www.cox.com.
 Cox Digital Premium Multiplex Channels are available in select markets. For more information, visit www.cox.com.
 Cox Digital Premium Multiplex Channels are available in select markets. For more information, visit www.cox.com.

Package Pricing

Cox Standard Service

- 74 video services including all your local broadcast channels
- Standard Service is FREE on all your additional outlets
- 24-hour customer service

All for just **\$44.99**

Cox Digital Cable

Access to over 280 channels including:

- Cox Standard Service
- 46 Music Choice channels
- Access to On DEMAND
- On-screen Interactive Program Guide
- Digital receiver and remote

Starting at **\$55.49**

Additional charges apply.

Value Packages

Choose 1 Tier or 3 Tiers

Cox Digital Choice Hits

- 1 Premium Network (up to 7 channels)
- Cox Digital Cable
- Cox Standard Service

\$67.99

Cox Digital Greatest Hits

- 2 Premium Networks (up to 23 channels)
- Cox Digital Cable
- Cox Standard Service

\$74.49

Cox Digital Trio

- Cox Standard Service
- Cox Digital Cable
- 3 Premium Networks (up to 33 channels)

\$79.99

Cox Digital Total Hits

- Cox Standard Service
- Cox Digital Cable
- 4 Premium Networks (up to 43 channels)

\$84.99

Additional Services

- Digital Video Recorder Service
- HD Basic Service
- HD Tier

\$4.95 per month
FREE per month
\$4.95 per month

Free Standard Service or Standard Service applies when you subscribe to Cox Standard Service or Cox Premium Service. Cox Standard Service is available in select markets. For more information, visit www.cox.com.
 Cox Standard Service is available in select markets. For more information, visit www.cox.com.
 Cox Standard Service is available in select markets. For more information, visit www.cox.com.

1-800-818-6652

High Definition Service

Experience digital home entertainment like never before!

Watch sports like you're actually there. Experience movies as if you're sitting in the theater. High Definition Service from Cox gives you the highest quality picture and sound. Best of all, it's easy to get!

- 1080i resolution (that's twice the color resolution and a picture that's six times sharper than traditional TV).
- Dolby Digital 5.1 surround sound audio.
- Theater wide-screen format.



Get these channels FREE with your HD Basic Service:**

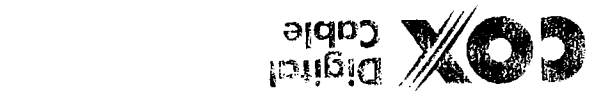


Add the HD Tier for just \$4.95 more per month:



Coming December 2006

** In basic service required for each HD channel and Cox Digital Cable required for premium HD channels. Paid subscription to Digital HD or Showtime required for HBO HD or Showtime HD, respectively. An HD-capable TV set with 750 P lines or more is required. HD and HD receiver rental: \$7.95 (month) required. Limit one HD receiver rental per household.



Digital Video Recorder

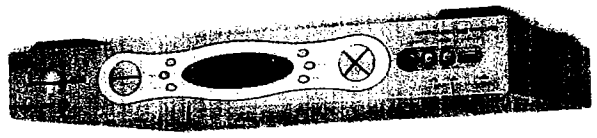
Never miss your favorite shows again.

- **Pause and rewind live TV** - Life's interruptions are a thing of the past. Pause the TV for whatever comes your way, then start watching where you left off.

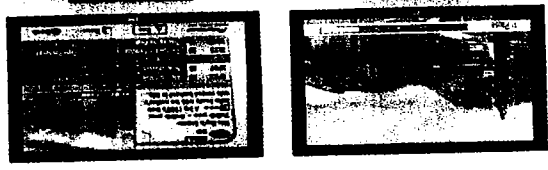
- **Easily record programs even when you're not at home** - With up to 50 hours* of storage capacity, you can record a week's worth of your favorite shows without having to worry about switching tapes.

- **Record two shows at the same time or watch one live show and record another** - Do all of this without tapes or a VCR. You can even record a whole series.

- **Record High Definition programming** - With DVR service from Cox, you can record your favorite high definition programs.*



TV Waits For You!



Record your favorite shows
Control live TV

Digital Video Recorder Service

\$4.95*/month

*The Cox DVR storage capacity is up to 50 hours for standard definition programming and up to 10 hours for High Definition programming. Cox Digital Cable DVR receiver rental: \$9.95 (month), and a TV set that has Cox service is required for DVR service. \$4.95 monthly DVR service fee per DVR receiver rental. On Demand and HD Check Channels available. *Need: Number of DVR's varies per household. Rental fee included.

Call today 1-800-818-6652

Movies On DEMAND

- A library of new release hits for only \$3.95
- Classic movies only \$1.95
- New titles every week
- No set start time—start watching when you want
- Watch as many times as you want for 24 hours
- No trips to the video store—no rewinding, returns or late fees

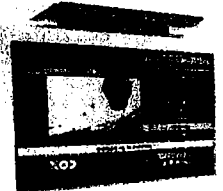
Premiums On DEMAND

- Subscribe to **HBO, Cinemax, Showtime** or **Starz** and get **HBO On DEMAND, Cinemax On DEMAND, Showtime On DEMAND** or **Starz On DEMAND FREE!**
- Anytime access to award winning original series
- Choose from hundreds of Hollywood movies, specials and kids programming



Subscription Video On DEMAND

- Choose from these monthly subscription services only available on Cox Digital Cable:
- AMERICA'S FUNNIEST HOME MOVIES** Favorites from the world of Japanese animation available any time you'd like. **\$6.95 per month**
 - WRESTLING** A huge library of classic wrestling programs including original shows and never-before-seen footage. **\$6.95 per month**
 - here!** A wide variety of groundbreaking original movies and series from the nation's first alternative lifestyle premium network. **\$6.95 per month**
 - Howard Stern** The ultimate uncensored collection of Howard Stern's complete television catalog and topings of his new show on Sirius satellite radio. **\$13.99 per month**



On DEMAND



Only with Cox Digital CableSM

Go to Channel 1

A world of entertainment is at your fingertips. On DEMAND on channel 1 gives you instant access to thousands of shows and movies and you control when you watch them!

- Included with your subscription to Cox Digital Cable.

- Easy access with your remote control.
- Pause, fast-forward and rewind—just like a DVD.

The best part—there's FREE programming the whole family can enjoy!

Look what's available:

Free Zone

Free to browse. Free to watch. Free Zone is your personal programming library of cable TV favorites, kids and sports shows, and even concerts and music videos. Available anytime you want at no additional cost.



