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March 26, 2007

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W.  
Washington, D.C. 20554

**Re: CS Docket No. 97-80 (Commercial Availability of Navigation Devices)**

Dear Ms. Dortch:

In its Second Report and Order in CS Docket No. 97-80,<sup>1</sup> the Commission directed certain multiple system operators (“MSOs”) – Comcast Corporation, Time Warner Cable, Cox Communications, Charter Communications, Adelphia Cable, and Cablevision – to file periodically with the Commission “reports detailing CableCARD deployment and support” as well as “the effort to develop and deploy a multistream CableCARD.” The Commission noted that the “cable operators may file separate reports or a joint report.” As a matter of convenience, NCTA has compiled the individual company reports and is submitting them as attachments to this letter. Should the Commission have questions about any of these reports, please contact me and I will ensure that the questions are forwarded to the appropriate person at the relevant company for a response. The cable systems formerly owned by Adelphia have been acquired by Comcast and Time Warner Cable, and in related transactions Comcast and Time Warner Cable swapped various systems. These acquisitions are reflected in the CableCARD count for both Comcast and Time Warner Cable.

**CableCARD Deployment and Support.** The MSOs which are reporting today – and which serve nearly 80% of the cable subscribers in the country – have deployed over 229,000 CableCARDS. When the CableCARDS deployed by the next five largest companies are included, *there have been over 259,000 CableCARDS deployed by cable operators serving approximately 90% of the cable subscribers in the country.* In addition to this significant deployment of CableCARDS, as of March 15, 2007, 26 consumer electronics (“CE”) manufacturers have had over 548 Unidirectional Digital Cable Ready Product (“UDCP”) models (such as Digital Cable Ready DTV sets) certified or verified for use with CableCARDS.

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<sup>1</sup> *Implementation of Section 304 of the Telecommunications Act of 1996: Commercial Availability of Navigation Devices, Second Report and Order, 20 FCC Rcd 6794 (2005).*

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**Multistream CableCARDS.** The Commission also asked for periodic reports on the “effort to develop and deploy a multistream CableCARD.” As reported in our March 30, 2006 report, CableLabs has qualified a Multistream CableCARD device from CISCO/Scientific-Atlanta. And in June 2006, CableLabs Qualified a Multistream CableCARD device from Motorola. So, both Motorola and CISCO/Scientific-Atlanta MultiStream CableCARDS are now qualified.

The Multistream CableCARD will operate in a backwards compatible, single-stream manner with a single stream device (*e.g.*, in a unidirectional digital cable ready device) or in the multi-stream manner when paired with a multi-stream device (*e.g.*, OCAP 2.0 devices). To greatly facilitate rapid development of the Host Multistream CableCARD interface, the HPNx Pro test tool is also commercially available to manufacturers.

As previously reported, on November 13, 2006, CableLabs announced that, with the assistance of consumer electronics parties including representatives from TiVo, Motorola, Soleki Systems Corporation, Digeo Interactive, Digital Keystone, and ViXS, it had reached an agreement on new testing procedures to verify UDCPs that have an M-Card interface which permits the use of an M-Card in multi-stream mode. In order to expedite the availability of such a test suite, CableLabs posted it at the CableLabs’ web site, [www.cablelabs.com/udcp](http://www.cablelabs.com/udcp). In January, 2007, CableLabs began to offer testing of UDCPs for conformance to the M-Card interface test suite as it does for UDCP conformance to the single-stream CableCARD interface.

If you have any questions about the information being submitted with this letter, please do not hesitate to contact me.

Respectfully submitted,

**/s/ Neal M. Goldberg**

Neal M. Goldberg

cc: Brendan Murray  
Julie M. Kearney  
Robert Schwartz

**Cablevision  
FCC CableCARD Quarterly Report  
December – February 2007**

**Introduction:** CableCARD technology, which enables digital televisions to display encrypted programming, has been available to 100% of Cablevision customers since July 1, 2004. The installation and service of CableCARDS is a routine practice and has been fully incorporated into the business. As with all technical service issues, each occurrence is logged into an automated database for escalation and resolution.

- 1. Current Number of CableCARD Subscribers:** 12,354 (as of March 12, 2007). A 9% increase in deployment from the 2006 4th quarter report. Cablevision is supporting 738 TiVo Series 3 HD Recorders on the plant network.
- 2. Number of CableCARDS in Inventory:** 16,006 [3,652 in reserve (non-deployed) inventory].
- 3. How are CableCARDS deployed:** All CableCARDS are professionally installed.
- 4. Percentage of Installs:** 100% of installs are professional installs requiring a truck roll
- 5. Average Number of Truck Rolls to Install a CableCARD:** 1.2
- 6. Monthly Lease rate for CableCARD:** \$1.25
- 7. Average installation Cost (if applicable):** Professional install fee is \$46.95.
- 8. Number of problems encountered with CableCARDS:** 3,319 installation and post-installation Remedy tickets were opened during the period of January 1, 2007 through March 12, 2007.
  1. Host Related: 55%
  2. CableCARD related including rebooting CableCARDS: 39%
  3. Network Related: 6%

**9. Of the problems encountered, please list how they were resolved: (Ex. TV Firmware upgrade)**

**Host DCR TV Issues (Sample)**

**Problem Description:**

CableCARD does not bind with the host - Swap the CableCARD.

**Occurs During:**

Installation

**Resolution:**

The technician will unbind first CableCARD install/bind another CableCARD. In some instances, the customer needs to contact the host TV manufacturer for a patch to be sent out for the specific host TV or professional visit by the manufacture's technician.

**Problem Description:**

Pixilation on most digital channels

**Occurs During:**

Post-Installation

**Resolution:**

Replace service drop or components to verify signal levels are within specification or customers may need to contact manufacturer directly to have a Certified Technician perform a service call to install new hardware in the DCR TV chassis.

**Problem Description**

DCR TV missing premium channels

**Occurs During:**

Post-Installation

**Resolution:**

Perform "reboot" by removing CableCARD and turning DCR TV off. Channels are usually restored

**Problem Description**

Select TiVo customers are losing copy protection authorizations on the TiVo Series 3 boxes.

**Occurs During:**

Post-Installation

**Resolution:**

Engineering is working with TiVo to determine the corrective action.

**Problem Description**

Certain TV models are displaying channel list problems

**Occurs During:**

Post-Installation

**Resolution:**

Engineering is working with manufacture to assist in downloading new code version to the hosts

**CableCARD Issues (sample)**

**Problem Description**

Customer getting CableCARD "no service" message every few minutes

**Occurs During:**

Post-Installation

**Resolution:**

Sent "hit" to CableCARD or customer removes CableCARD from DCR TV.

**Problem Description**

CableCARD error 161-4

**Occurs During:**

Post-Installation

**Resolution:**

Cabledata "hit" to CableCARD and reset TV

**Problem Description**

Customer has black screens on premium channels only.

**Occurs During:**

Post-Installation

**Resolution:**

Hit card. Have the customer turn off DCR TV and remove card and replace card.

## **10. Problems encountered in deploying CableCARDS and how problems are resolved**

Cablevision has established technical support protocols to enable the technician to receive immediate troubleshooting support from Dispatch, Network Support or Engineering if the technician encounters a problem during the professional installation of CableCARD equipment. It should be noted that Cablevision responds to each CableCARD performance issue in the same manner we respond to other CE interoperability issues (e.g., DVI, HDMI or 1394 interoperability issues).

If the technician is unable to complete the installation due to technical issues, the technician is required to record the reason(s) why the install was not completed and the work order remains open. At the customer's request, a follow-up visit is conducted to further troubleshoot the problem and/or install a second (new) CableCARD. At this visit, additional personnel may accompany the technician to provide enhanced technical support. If customers are unable to activate their equipment due to interoperability issues, Cablevision will contact the CE manufacture to define the issue, resolve the problem and once again offer the customer the CableCARD installation.

The data (fix codes) collected from the problem are analyzed by the operations and engineering departments to determine if there are systematic issues contributing to the CableCARD technology not functioning properly on the network.

Cablevision has also undertaken significant steps to pro-actively work with all the major CE manufacturers to identify the numerous CableCARD enabled devices and conduct interoperability testing in our (single) test laboratory before any problems have been experienced in the field."

**Charter Communications  
FCC CableCARD Reporting  
December 1, 2006 – February 28, 2007**

1. Current Number of CableCARD Subscribers:

The total number of CableCARDS in service through February 28, 2007 is 19,877.

2. Provide the number of CableCARDS in inventory:

SA CableCARD devices: 2761  
Moto CableCARD devices: 6460  
Total CableCARD devices: 9221

3. How are CableCARDS placed in service?

Installations of a CableCARD requires a professional installation, including a truck roll, in all serviced areas with the exception of the North Carolina/Virginia market area, in which there is a self-installation process. Self installations account for .005% of all CableCARD installations during the reporting period.

4. Whether service calls are required for all CableCARD installations?

Yes, except for self installations reported at 3. above.

5. Average Number of Truck Rolls to Install a CableCARD?

The average number of truck rolls to install a CableCARD (i.e., the initial truck roll and any truck rolls within 30 days from the date of installation) through February 28 was 1.3.

6. Monthly Lease rate for a CableCARD?

The average monthly lease for a CableCARD device is \$1.50.

7. Average installation cost of a CableCARD (if applicable):

The average cost for a professional installation is \$32.00.

8. Process for Resolving CableCARD trouble calls:

Customers with a CableCARD problem are directed to call the Charter customer service number. Customer Service Representatives (CSRs) are trained about the features and benefits of CableCARDS, just as they are trained on any other Charter product offering. Some CableCARD calls are forwarded to the Advanced Services Team, whose members have more training and expertise on

troubleshooting such calls. If the problem cannot be resolved over the phone, the CSR places a service order, which is then fulfilled by the cable installers and technicians. Charter maintains a record of any service calls for which a technician is dispatched.

Should a local cable installer or technician encounter a CableCARD problem, he/she reports such problem to his/her supervisor and the local technical support group. If the problem is not resolved at the local level, it is then escalated to corporate engineering or billing. If there appears to be a host problem, Charter has a designated member of its engineering department contact and place a report with the consumer electronics vendor or with the host manufacturer to resolve the issue as appropriate.

9. Reported problems associated with CableCARDS and how they were resolved:

Charter has experienced a steady decline in problems with its CableCARDS since reporting began,<sup>1</sup> a trend which continues this quarter with all verified problems resulting from digital television (“DTV”) hosts.

The problems and resolutions listed on the chart below are illustrative of the problems encountered at both the local and regional level as well as those that were escalated to Charter’s corporate offices. The host manufacturer for each problem is identified by a letter only to maintain confidentiality, with such letter corresponding to the same identified manufacturer(s) from previous reports. All but one of the undetermined issues on the below chart remains in the troubleshooting phase in order to identify the problem source.

The installation issues associated with the network which were encountered this quarter were resolved *at the time of installation* through Charter’s standard troubleshooting processes. Charter continues to troubleshoot and resolve problems occurring with various makes and models of digital television hosts as they arise.

DIV.	TYPE	ISSUE	RESOLUTION	TV MFGR.
Central	Host	DTV host will not get any channels. Installed an HD box on another input to the DTV which works fine. Troubleshooting failed to correct the problem.	A firmware upgrade corrected the problem.	A

<sup>1</sup> See Charter Communications FCC CableCARD Reporting, September 1, 2006 – November 30, 2006, p. 2, Attachment to Letter from Neal M. Goldberg to Marlene H. Dortch, Commercial Availability of Navigation Devices, CS Docket 97-80 (filed December 22, 2006).

East	Unknown	The device is non-functional after DTV host manufacturer firmware upgrade	Charter is working on the issue, which is still unresolved.	K
East	Unknown	The device is non-functional after DTV host manufacturer firmware upgrade	Charter is working on the issue, which is still unresolved.	K
East	Host	TNT-HD and Uni-HD are blank with no information. CP screen won't appear. A new card was tried and the screens appear without information. The pictures are going blank a second after tuning to them.	Installed old card and referred customer to manufacturer.	J
East	Host	The DTV host stays on channel 3 despite multiple cards and technical troubleshooting.	Referred customer to manufacturer. Charter will also look into it further.	K
East	Host	One tuner remained inactive on CableCARD host device.	An initialization hit corrected problem.	Not recorded
East	Unknown	Analog and upper HD channels appeared but digital channels did not. Troubleshooting did not correct the problem.	The customer used a set top box.	Not recorded
West	Host	HD channels were dropping off.	An initialization hit was sent.	J
West	Host	The DTV host would not work with CableCARD.	A firmware upgrade corrected the problem.	K
West	Unknown	No sound would come through on two channels.	Charter is still working on the issue.	L
West	Unknown	DTV host was unable to receive certain channels.	Another service call was scheduled.	L
West	Host	Unable to get the DTV host to work with any CableCARDs after troubleshooting.	Work continues between Charter and the manufacturer.	K
West	Host	No digital channels would appear. Channels were locking up	New firmware from the manufacturer was installed.	D
West	Host	Most HD and other digital channels would not appear.	The dealer replaced the DTV host set and everything worked fine.	J
West	Host	No digital channels displayed.	Technician power cycled the DTV.	D

**Comcast  
FCC CableCARD Report  
December 1, 2006 – February 28, 2007**

<b>Current Number of CableCARDS installed in active customer homes</b>	134,794
<b>Number of CableCARDS in Inventory</b>	56,478
<b>How are CableCARDS deployed: Truck Roll / Self Install / Both</b>	Both
Percentage of Installs - Truck Rolls	92.0%
Percentage of Installs - Self Installs	8.0%
<b>Number of Service Calls On CableCARD Installs</b>	2680
<b>Average Number of Truck Rolls to Install a CableCARD</b>	1.14
<b>Monthly Lease Rate for CableCARD</b>	\$0.00
<b>Monthly Lease Rate for Additional CableCARD in the Same Device</b>	\$1.50 - \$2.00
<b>Average CableCARD Installation Cost</b>	\$26.24

**Process for Resolving CableCARD Problems**

The Comcast CableCARD problem escalation process begins with the local installer/technician and escalates to local supervisory personnel, then to the Division office, and finally to corporate engineering for further escalation to CableLabs or to senior contacts at the CE manufacturer as needed. The local market is expected to review CableCARD issues lists and troubleshooting information posted on an internal website prior to escalation. If an issue with the CE Host device is suspected the local market personnel also make an initial contact to the CE manufacturer's standard support line for help prior to escalation.

**Examples of Specific Issues and Resolutions**

A customer was losing service authorizations on a regular basis until our technician reseated the CableCARD in the Host.

A customer's CableCARD capable DVR device would not receive encrypted services through the CableCARD. The customer device turned out to be defective.

Several different problems with CableCARD devices are still pending after escalation to the device manufacturer.

A number of different problems with CableCARD devices were resolved when the customer obtained a replacement device.

Cox Communications FCC CableCARD Reporting  
December 01, 2006 through February 28, 2007

1. The number of Residential CableCARD devices in service:  
Cox TOTAL: 20,712  
Moto Total: 9,987  
SA Total: 10,725
2. General availability of CableCARD devices:  
Total CableCARD devices available: 11,264
  - a. Please provide an indication of supply availability for SA and Motorola CableCARDs  
SA CableCARD devices: 7126  
Moto CableCARD devices: 4138

\*The above numbers only include inventory available in our billing system and inventory currently assigned to FSRs. It does not include inventory assigned to subscriber accounts, inventory pending disposition or repair, etc.

3. How cards are placed in service  
A professional installation, requiring a truck roll, is currently required for all CableCARD device installs.
4. Whether service calls are required for all CableCARD device installations?  
Yes.
5. Average number of truck rolls to install a CableCARD device?  
The average number of truck rolls needed to install a CableCARD device includes the initial truck roll for the install itself and any truck rolls required within 30 days of the install.  
  
The average number of truck rolls to install a CableCARD was: 1.122  
  
The breakdown for each month is as follows:
  - Nov 2006: 1.160
  - Dec 2006: 1.128
  - Jan 2007: 1.079
6. Monthly price charged for a CableCARD?  
The average monthly rental for a CableCARD device is \$ 1.89
7. Average installation cost of a CableCARD if applicable?
  - a. What is the service charge to the subscriber for the installation?  
The average cost for a professional installation is \$ 31.45
8. Problems encountered in deploying CableCARD devices and how problems are resolved?  
Total number of trouble calls for all CableCARD issues, escalated and un-escalated:
  - December 2006: 1039
  - January 2007: 1379
  - February 2007: 855

Cox Communications FCC CableCARD Reporting  
December 01, 2006 through February 28, 2007

Only the issues that were escalated to the Atlanta corporate offices are described below. Cox also uses a bi-weekly conference call to distribute information to the systems, such as issues lists and CE-supplied troubleshooting documentation, in an effort to provide the systems with the information they'll need to avoid escalation.

**Host Problems:**

Site 19, Manufacturer 14

- Problem: DCR device would not receive services.
- Resolution: After completing all Cox troubleshooting with no issue found, customer was referred to the host manufacturer for further assistance. Customer decided to purchase a different DCR device.

Site 19, Manufacturer 12

- Problem: DCR device could not receive some HD Channels.
- Resolution: After completing all Cox troubleshooting with no issue found, customer was referred to the host manufacturer for further assistance.

Site 20, Manufacturer 12

- Problem: DCR device could not receive channel 704.
- Resolution: After completing all Cox troubleshooting with no issue found, customer was referred to the host manufacturer for further assistance.

Site 19, Manufacturer 9

- Problem: DCR device showing random channels off air.
- Resolution: After completing all Cox troubleshooting with no issue found, customer was referred to the host manufacturer for further assistance.

Site 24, Manufacturer 25

- Problem: DCR device not receiving audio on two channels.
- Resolution: After completing all Cox troubleshooting with no issue found, customer was referred to the host manufacturer for further assistance.

Site 24, Manufacturer 16

- Problem: DCR device not receiving audio on A&E HD channel.
- Resolution: After completing all Cox troubleshooting it was found that A&E HD contained a data PID called SCTE35 Msg (0x52) that was in between the audio and video PID. To resolve customers must call manufacturer to request firmware upgrade for DCR device.

Site 24, Manufacturer 21

- Problem: DCR device not receiving audio on several channels.
- Resolution: After completing all Cox troubleshooting with no issue found, customer was referred to the host manufacturer for further assistance.

Site 24, Manufacturer 21

- Problem: DCR device not receiving audio on several channels.
- Resolution: After completing all Cox troubleshooting with no issue found, customer was referred to the host manufacturer for further assistance.

Cox Communications FCC CableCARD Reporting  
December 01, 2006 through February 28, 2007

Site 6, Manufacturer 7

- Problem: Black screens on several channels
- Resolution: After completing all Cox troubleshooting with no issue found, customer was referred to the host manufacturer for further assistance.

Site 3, Manufacturer 7

- Problem: Unable to get diagnostic screen to view host info
- Resolution: After completing all Cox troubleshooting with no issue found, customer was referred to the host manufacturer for further assistance.

Site 10, Manufacturer 21

- Problem: When turning to a premium channel, for example HBO the channel will come in for about 3 seconds and then flash off saying that it's not permitted through the TIVO DVR box.
- Resolution: After completing all Cox troubleshooting with no issue found, customer was referred to the host manufacturer for further assistance.

Site 10, Manufacturer 8

- Problem: Not receiving any Digital or HD channels
- Resolution: After completing all Cox troubleshooting with no issue found, customer was referred to the host manufacturer for further assistance.

Site 10, Manufacturer 9

- Problem: Audio Skip on HD channels
- Resolution: Upgraded Card. All channels come in.

Site 10, Manufacturer 23

- Problem: Unable to get Diagnostic screen to come up.
- Resolution: After completing all Cox troubleshooting with no issue found, customer was referred to the host manufacturer for further assistance.

**CableCARD Problems**

Site 19, Manufacturer 27

- Problem: DCR device was not receiving all services.
- Resolution: The CableCARD was replaced, fixing the issue.

Site 19, Manufacturer 27

- Problem: DCR device was not receiving services.
- Resolution: After completing Cox troubleshooting, replacing connectors and cable resolved the issue.

Site 26, Manufacturer 9

- Problem: DCR device was not receiving services.
- Resolution: Manually un-paired and re-paired the CableCARD with the host, which resolved the issue.

Cox Communications FCC CableCARD Reporting  
December 01, 2006 through February 28, 2007

Site 15, Manufacturer 7

- Problem: Black screens on several channels
- Resolution: After completing all Cox troubleshooting the CableCARD was replaced. All channels are coming in.

Site 15, Manufacturer 25

- Problem: Black screens on several channels
- Resolution: After completing all Cox troubleshooting the CableCARD was replaced, all channels are coming in.

9. Process in place for resolving existing and newly discovered CableCARD implementation problems:

For any CableCARD issues encountered by a subscriber, Cox follows a prescribed troubleshooting process. If the troubleshooting resolves the issue, no further action is taken. If the troubleshooting procedures do not correct the issue, the issue is escalated to one or more of the following personnel within the system: (i) the Digital test desk; (ii) the IT group, and/or; (iii) the system's DAC or DNCS administrator. If none of the foregoing is able to resolve the issue, a problem form is completed and sent to corporate engineering. The problem form collects specific details about the problem and alerts the engineering team to the relevant issues. Corporate engineering then follows up on the issue, contacting all of the necessary parties (including the CE manufacturers) until the issue is resolved.

In addition, a representative from each Cox system attends a platform specific bi-weekly conference call to discuss relevant CableCARD issues that have not yet been escalated, significant trends in the installation and maintenance of CableCARDs, and customer concerns within the system. Cox also uses this conference call to distribute important information to the systems, such as CE-supplied troubleshooting procedures or installation documentation. Atlanta operations and Engineering personnel are usually engaged on the call and work with the systems to resolve any issues or concerns.

In addition, Cox maintains an intranet site containing information about CableCARDs and specific issue updates. Cox Customer Support, Field Service, and Field Service Support also may use this site to review troubleshooting guidelines or details from CE manufacturers.

The DAC and DNCS administrators in each system also have direct connections with ATL operations and engineering to escalate any issues that require immediate assistance.

**Time Warner Cable  
FCC CableCARD™ Status Report  
December – February 2007**

*Current number of CableCARDs customers: 41,327*<sup>1</sup>

*Number of CableCARDs available in inventory: 18,017*

*How are CableCARDs deployed? **Majority of TWC divisions require a service appointment.***

*Percentage of installs: **Service Appointment: 96%; Self Install: 4%;***

*Average number of truck rolls required to install a CableCARD: 1.23*

*Monthly lease rate for CableCARD: <sup>2</sup> **Average: \$2.24. Most divisions are at \$1.75.***

*Do you charge for CableCARD installs? **Some divisions charge a standard installation fee for CableCARDs while others waive the installation charge per division business procedure***

*What is the average installation cost? **\$22.25***

*What is your process in resolving existing and newly discovered CableCARD implementation problems?*

**The process reported in our previous submission is still in place. The web forum referred to as “eRoom” is still in use for resolving existing and newly discovered CableCARD implementation problems. The eRoom also allows TWC divisions to share information on issues and work together to resolve them.**

*Problems encountered with CableCARDs and their resolution*

**Our divisions continue to report a variety of different issues arising with respect to CableCARD host device installations.**

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<sup>1</sup> This total reflects TWC's current divisions after subtracting Houston (now a Comcast division).

<sup>2</sup> The monthly lease rate for CableCARDs reflects an average across all TWC divisions. Some of our divisions are still in the process of standardizing CableCARD lease rates within their divisions, due to differences in pricing stemming from legacy lease rates within cable systems formerly owned by Adelphia Communications Corporation and related systems swapped with Comcast Communications Corporation.

**Problem:** Incorrect software/ firmware on host devices continue to cause most of the reported issues to date and are common across all CE brands.

**Resolution:** The standard procedure is for the cable technician to inform the customer that a software patch to upgrade the Host from the CE manufacture is required to correct the issue. A follow-up service appointment is needed after the CE manufacturer has completed the upgrade to re-install the CableCARD.

**Problem:** Missing or no channels on Host device due to faulty non-compliant customer installed in home wiring devices such as splitters and coaxial jumper cables.

**Resolution:** A cable technician will replace equipment and bring signal levels into spec along the lines for other equipment.

**Problem:** CableCARDS not seated properly into Host device at time of installation.

**Resolution:** Technician/customer reseats the CableCARD activating the MMI screen and initializing authorization.

**Problem:** CableCARDS in firmware upgrade/update loop. VCT tables corrupted on DNCS

**Resolution:** DNCS re-started to get cards back in service

**Problem:** Correctly programming the television to properly display all channels.

**Resolution:** The problem is solved by reading the operational manual of the television or calling the manufacturers technical support.