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December 29, 2000

Ms. Magalie Roman Salas
Secretary
Federal Communications Commission
445 12th Street, S.W.
12th Street Lobby
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Washington, D.C. 20554

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Re: Applications Of America Online, Inc., and Time Warner Inc.
for Transfers of Control (CS Docket No. 00-30)
Ex Parte Communication

Dear Ms. Salas:

During the course of the debate on Instant Messaging interoperability, there has been some confusion as to how quickly a so-called server-to-server standard can be developed for communication between competing IM services. The source of that confusion, we believe, lies in a misunderstanding of the difference between ad hoc standards development (i.e., by one company or a set of companies such as in the context of IMUnified) and standards development within the confines of a standards-setting body (i.e., the Internet Engineering Task Force).

This letter clarifies that no technical obstacles impede the development of a server-to-server standard. Indeed, existing work-product on IM interoperability can be enhanced easily to allow server-to-server instant messaging between and among competitors – and if that effort were undertaken on an ad hoc basis, an effective solution could be produced in as few as six months. To the extent the Commission has heard different predictions as to when a server-to-server standard might be completed, those differences stem from the difficulty in predicting when a standards-setting body such as the IETF might approve a particular standard.

To illustrate, Microsoft Corporation has built into its Exchange 2000 product the so-called RVP protocol for instant messaging. Earlier this year, Microsoft submitted that protocol to the IETF as a "reference," so that others could understand how instant messages would be sent and received within an Exchange 2000 environment. According to the submission:

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The RVP protocol, is designed to enable . . . notifications and messages across a loosely coupled (federated) constellation of servers. RVP is designed to address the need for notification in a secure, reliable and scaleable fashion. RVP encompasses the client-server and server-server interactions.

The full text of the submission is at http://www.ietf.org/internet-drafts/draft-osborne-rvp-00.txt.

Though the IETF does not appear to be pursuing this course, it would be manageable to graft onto this protocol the conventions necessary to allow server-to-server interoperability among competing systems (e.g., conventions for authentication of competitors' servers for exchanging audio, video and text files, and the like). Microsoft's submission to the IETF provides just one example. The IETF currently has under review several promising methods for enabling IM interoperability on a server-to-server basis. Many of those simply would extend the IETF's already-completed Session Initiation Protocol (SIP) so that it would support IM functionality. A list of those proposals is available at http://www.imppwg.org (at that site click on "WG Activities," then click on "Proposals for IMPP Candidates").

This establishes that the IM industry can move forward quickly to achieve server-to-server interoperability, even before the IETF establishes a final protocol.

In closing, we want to emphasize that client-to-server schemes can be – and are being -- enhanced in a similar fashion to facilitate that form of interoperability between competitors, yielding benefits for consumers. Because the Commission at this point is particularly interested in server-to-server standards, we want the record to be clear that server-to-server interoperability is eminently achievable within six months if *all* interested parties have a genuine commitment to achieve that goal.

Sincerely,

Gerard J. Waldron
Counsel to Microsoft

GJW/cad

cc: Commissioner Susan Ness
Commissioner Gloria Tristani
Commissioner Michael Powell
Commissioner Harold Furchtgott-Roth
Kathy Brown
Karen Onyeije
Mark Schneider
David Goodfriend
Susan Eid
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