

August 30, 2019

via ECFS and e-mail

Marlene H. Dortch
Secretary, Office of the Secretary
Federal Communications Commission
445 12th Street, SW, Room TW-A325
Washington, DC 20554

**Re: CG Docket Nos. 05-231 and RM-11848
MB Docket No. RM-11065**

Dear Ms. Dortch,

The below-signed Consumer Groups and accessibility researchers respectfully respond to the August 26 motion by National Association of Broadcasters (NAB) and NCTA—The Internet & Television Association¹ to extend the comment deadlines for the Consumer Groups' and researchers' July 31 Petition for Declaratory Ruling and/or Rulemaking on live closed captioning quality and automatic speech recognition (ASR)² established in the Commission's August 14 public notice of the Petition.³

As we noted in the Petition, it is urgent for the Commission to address the treatment of ASR under the Commission's closed caption quality rules because addressing the quality of closed captioning for live television is critical to vindicating the civil rights of the more than 48 million Americans who are deaf or hard of hearing to participate fully in the democratic, cultural, and economic opportunities afforded by equal access to video programming.⁴

However, given the upcoming meeting between representatives of several of the Groups and researchers with NCTA and NAB and our mutual interest in reporting the results of that meeting on the record, we do not object to the extension proposed in the motion.

Please don't hesitate to let us know if you have any questions.

¹ <https://www.fcc.gov/ecfs/filing/10826302908352>.

² <https://www.fcc.gov/ecfs/filing/10801131063733>.

³ <https://www.fcc.gov/document/request-comment-tdi-et-al-caption-quality-petition>

⁴ Petition at 2-3.

Respectfully submitted,

/s/

Blake Reid

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CC:

Suzy Rosen Singleton and Debra Patkin, Disability Rights Office

Certificate of Service

I, Blake Reid, do hereby certify that a copy of the foregoing response was served on August 30, 2019 via e-mail to:

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/s/

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