

September 17, 2019

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street SW
Washington, DC 20554

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

Dear Ms. Dortch,

The below-signed members of the advisory group for the Project Television Access--funded by the U.S. Department of Education grant #H327C150009--the Dicapta Foundation Board of Directors and Dicapta Corporation respectfully support the petition for rulemaking, referenced above, as follows:

1. Entirely support the initiation of a notice of inquiry into the current state of "closed captioning techniques for live television programming and how the varying dimensions of caption quality, including accuracy, synchronicity, completeness, and placement affect the accessibility of video programming;"
2. Entirely support the request to launch a rulemaking "to develop rules requiring live television programming to be captioned at a level that meets or exceeds technology-neutral metrics guaranteeing that the programming is accessible by Americans who are deaf or hard of hearing;"
3. Regarding issuing a declaratory ruling or expedited rule change "on the use of automatic speech recognition (ASR) technologies for captioning of live television programs," this group considers that if now or in the future ASR, or any similar technologies, guarantee that the programming is fully accessible by Americans who are deaf or hard of hearing, these technologies should be allowed. Unfortunately, at this moment, an objective evaluation of the new technologies available in the market is not feasible due to the lack of a framework with metrics for determining the completeness, accuracy, readability, and synchronicity of captions.

Our group has been working toward making TV in Spanish accessible to people with sensory disabilities for almost 15 years. As the referenced petition mentions, captioning quality of live programming is poor. Although the captioning rules are equal for English and Spanish, Spanish captioning presents more challenges than English captioning (most Spanish channels are exempt from the captioning requirements, and Spanish speaking users are less prone to complain when they detect lack of captions). In terms of quality, the challenges are the same as the ones addressed in the petition regardless of whether the captioning language is English or Spanish.

Finally, our group wants to emphasize that we consider the Commission's current procedure to monitor compliance of captioning rules and best practices based on complaints made by users is not adequate. There is no way for a deaf or hard of hearing consumer to determine if captions are accurate, synchronic, complete, and correctly placed. We strongly recommend the inclusion in this new ruling of a new way to monitor compliance handled by the

Commission and based on objective, technology-neutral quality standards rather than depending on the user's complaints.

Respectfully submitted,

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