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The Office of the Secretary
Federal Communications Commission
1919 M Street, NW
Washington, DC 20554

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March 26, 1996

To Whom It May Concern:

In the matter of Closed Captioning and Video Description of Video Programming (FCC 95-484), I would like to add some comments.

You will want to know where I am coming from: I am a 33-year old American who has been deaf since birth, and am currently a resident of Washington, DC and a doctoral candidate in the linguistics program at Georgetown University in DC.

I feel there is a strong need to make sure the following are closed captioned:

• ALL local news, including news being reported live, and the last minute of news just before any commercial begins.

I am very tired of seeing taped news broadcasts that are captioned but which are interrupted every few minutes with live reporting from the field which is not captioned. What if it is precisely those uncaptioned live moments that I need access to, like a fire or some other emergency going on in my own neighborhood?

It should also be added that the last minute of every news broadcast just before advertising begins is ALWAYS cut off, so that the hearing audience gets the entire message and the Deaf audience is left groaning and wondering what was said. The cut-off happens because the camera people hear the end of the sentence in spoken English and immediately switch to advertising, while the captioner is always a few seconds behind the speaker and still needs an extra few seconds to type the remaining words into closed captions. The cut-off is VERY offensive and quite annoying. This part should have its closed captions completed BEFORE any advertising begins. It should be noted that this is not a problem at the very end of any news program, when the credits scroll up the screen. This should also apply if an American Sign Language interpreter is used instead of closed captioning (interpreters have been used in emergencies in the past at stations where closed captioning equipment did not exist, especially after earthquakes in California), please make sure that their last few signs are not cut off either.

• ALL television programs and ALL television advertising.

Many times I turn on the television and not one single program on any channel has been captioned. I resent being cut off from the airwaves simply because the stations and program producers decided closed captioning costs them too much. If they want access to the television media, they should make all of their broadcasts accessible to ALL who have vision. This should also include the advertisements at the end of weekly programs that show snippets of what will appear in the next episode - how come this part is NEVER captioned???

The majority of the advertisements that appeared during the most recent Super Bowl were not captioned, and many of those ads are only shown once, never to be shown again. It can cost hundreds of thousands of dollars to advertise for a few seconds during the Super Bowl, while costs of closed captioning is only a drop in the bucket in comparison, and YET they weren't captioned? I fail to understand the justice of this. It seems to imply that Deaf people aren't an important part of the audience and any costs that would have been spent for closed captioning is expendable.

• ALL videos distributed for free or sold to the public.

Perhaps this should apply to videotapes only if more than a certain number of videos were distributed, such as 2,000 or more videos. But it should apply to ALL videos that are rented or sold at ANY video rental store. The video companies fought furiously against a legislative proposal for this in Maryland, and they won, because they claimed the cost of closed captioning was prohibitive, but to me this is rubbish when one considers that they sell their videos across an entire country and abroad with large budgets, while the process of closed captioning a tape only has to occur once and its cost can be easily incorporated into the cost of purchasing the video.

• ALL movies that appear on computer CD-ROM disks, such as with QuickTime movies where sound appears in the movie.

These programs should have a button that can be pressed on the computer screen using a mouse that automatically turns on or off the closed captions. This technology may someday replace video technology and could replace or supplement parts of television eventually, so it is important that accessibility for Deaf and Hard of hearing users be established as a mandatory feature as soon as possible in the early stages while this technology is still in its infancy.

• There should be a truth-in-captioning law.

I am VERY tired of captioners assuming that Deaf people have limited vocabularies and automatically dumbing down the vocabulary being used to fit their image of what Deaf people are able to understand. Many times I am able to lipread what a TV character says and have noticed that the closed captions show the fourth grade equivalent of what the TV character said. This is very insulting as to the implied level of our intelligence. For example, any idioms that are used on television, often what is captioned is a translation of that idiom in straight English. Why not simply show the idiom word for word and let us learn the vocabulary??? That's why people buy dictionaries. Or do they think we don't know how to use a dictionary, and they think they are doing us a favor? In addition, it's been shown that Deaf children and hearing children with access to closed captions improve their English and reading skills when they are allowed to see the actual dialogue.

• Closed captions should NOT block or otherwise be superimposed over any English words that appear underneath them on the TV screen.

This often happens, I think mostly with the television news, and then Deaf people are blocked from receiving the information that can't be seen. For example, Channel 4, during the recent snowstorm of the decade earlier this year and several times since, gave the address of their Weather Web Site in the same part of the television screen where the closed captions were appearing, and I was totally unable to read that internet address, trying to read it in the space between the closed captioned words even as the closed captions themselves continued to scroll up the lower part of the screen. Many times I am tempted to have two of my televisions sets stand side by side, one with the closed captions on and one with the closed captions turned off, so that I will not miss anything that could be important. A special program was used for a time recently, by Washington, DC's local Channel 4 for their news, so that closed captions and captions giving names or titles of whoever was on the television screen did not conflict, but for some reason they did not make use of this program for occasions such as this. ALL channels should make use of this program, and it should be utilized far more frequently even by Channel 4.

Everything above where I have referred to 'television', that should apply to BOTH public and cable television, both large and small stations.

• I also want to see all old movies, regardless of whether on television or in video, closed captioned, and this should apply to ALL videos made or any movies shown on television

after a certain date, regardless of when the original movie was made. I have sought in vain for movie classics such as "Citizen's Kane" on video that was captioned, and to this day still have not been able to watch that movie with access to its dialogue. I have yet to catch it on television with it closed captioned. A copy of that movie was released a few years ago on video with closed captions (it was released once before without captions), but none of the local video rental chains in Dupont Circle had a copy of that video in the closed captioned version. Last month I checked with the student-run video rental place on the Georgetown University campus, and they had only the UN-captioned version of the Citizen's Kane video. I refuse to buy the argument that captioning costs can be economically burdensome to a provider of video programming; I strongly believe that they are resourceful and they will always find a way to make a profit off of any video programming property that they own. They could compensate by selling even more videos than they had originally planned, to help them recover costs of captioning the video, for example.

• Every movie that is released, a video version with closed captions should also be mandated to reach the market simultaneously so that Deaf people don't have to wait another three years before the captioned video finally comes out. That always drives me crazy, that the Deaf community must always wait for so long to find out what everybody else was talking about three years before.

Sincerely,

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