

January 8, 2015

via electronic filing

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

Subject: Closed Captioning Quality – CG Docket No. 05-231 – second further notice

We strongly encourage the Commission to keep the new closed captioning standards implementation date of January 15, 2015 in the above-referenced proceeding. Video program distributors “VPDs”, captioning companies and video programmers “VPs” have been working toward this date for months. Consumers have awaited the improved closed captioning standards for years and should not have to wait any longer. The VPDs understand and should want to provide the best possible captions to their audience considering the increased usage of closed captioning over the last decade. Additionally, it is often difficult to determine where potential closed caption errors are introduced – VPDs technical equipment? Source file? Combination of both? This would leave room for finger pointing and waiving of responsibility. We believe the VPDs should ultimately be held responsible as they have the ability to ensure compliance with the new standards.

The idea of requiring VPs to provide certification to the FCC is a good idea but not in-lieu of the VPDs. The Commission should be prepared for thousands to tens of thousands of certifications from VPs and have the staff in place to properly manager this additional workload. Many VPs that air/distribute their programs on FCC governed TV stations also distribute their video directly from their own website or other sites like YouTube, Vimeo, etc. For this reason, we strongly encourage a future plan to require VPs to also certify with the FCC. This will help ensure that proper closed captioning is displayed on all possible distribution options.

Respectfully,



Matthew Cook
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