



Consumer Electronics Association  
1919 South Eads Street  
Arlington, VA  
22202 USA  
(866) 858-1555 toll free  
(703) 907-7600 main  
(703) 907-7601 fax  
[www.CE.org](http://www.CE.org)

*Via Electronic Filing*

March 3, 2015

Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 Twelfth St., S.W.  
Washington, DC 20554

*Re: Notice of Ex Parte Presentation – MB Docket Nos. 12-108 & 12-107*

Dear Ms. Dortch:

This is to notify you that on February 27, 2015, Julie Kearney, Vice President, Regulatory Affairs, and Bill Belt, Senior Director, Technology and Standards, Consumer Electronics Association (“CEA”), spoke by telephone with Michelle Carey, Deputy Chief of the Media Bureau.

The purpose of the February 27 call was to follow up with answers to questions from CEA’s February 11 meeting with FCC staff regarding the forthcoming Report & Order addressing the issues contained in the FCC’s Further Notice of Proposed Rulemaking on *Accessibility of User Interfaces, and Video Programming Guides and Menus*, released October 31, 2013.<sup>1</sup> The FCC staff asked several general questions about the state of industry readiness in complying with the user interface requirements in FCC regulations. CEA described the many positive developments it has seen from members, including some of the technology solutions on display at the 2015 International CES.

At the February 11 meeting, CEA agreed to query its members regarding two additional FCC staff questions that were raised during the meeting. Specifically, the first question dealt with the activation of closed captions and the accessibility of the closed caption attributes in ANSI/CEA-708. The second question related to voice and gesture control of TV features.

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<sup>1</sup> See Letter from Julie M. Kearney, Vice President, Regulatory Affairs, CEA, to Marlene H. Dortch, Secretary, FCC (filed Feb. 13, 2015), <http://apps.fcc.gov/ecfs/document/view?id=60001029523>.

CEA informally polled members in the TV manufacturing business and we received responses from manufacturers representing over 60% of U.S. sales in 2013. We received additional responses from several manufacturers of navigation devices. The poll was informal and unscientific, but it yielded important information.

First, according to CEA's informal inquiries, TV manufacturers intend to make caption display settings accessible via mechanisms reasonably comparable to a button, key, or icon through several methods **including** a button on the remote **or** access through the first level of a menu. Additionally, manufacturers are making efforts to streamline access to the ANSI/CEA-708 attributes.

Second, based on the informal feedback provided to CEA, no TV manufacturers who responded plan to provide access to the closed captions and video description features **only** via voice or gesture control. In other words, manufacturers plan to provide access via mechanisms reasonably comparable to a button, key, or icon through more traditional means, such as a button on the TV or via selection on a remote control. Some manufacturers intend to incorporate voice or gesture control as additional access mechanisms. CEA is pleased to support industry progress in implementing the new rules.

Pursuant to Section 1.1206 of the Commission's rules,<sup>2</sup> this letter is being electronically filed with your office and a copy of this submission is being provided to Ms. Carey and also to FCC staff members who participated in the February 11 meeting. Please let the undersigned know if you have any questions regarding this filing.

Respectfully submitted,

/s/ **Julie M. Kearney**

Julie M. Kearney  
Vice President, Regulatory Affairs

cc: Michelle Carey  
Mary Beth Murphy  
Steve Broeckaert  
Maria Mullarkey  
John Kiefer  
Karen Strauss  
Rosaline Crawford  
Eliot Greenwald

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<sup>2</sup> 47 C.F.R. § 1.1206.