

April 10, 2015

VIA ECFS

Secretary
Federal Communications Commission
445 12th Street, SW
Washington, D.C. 20554

RE: Comments In Support of Waiver of Accessible Emergency Information Requirements
MB Docket Nos. 12-107, 11-43

Dear Madam Secretary,

As described further below, the undersigned television broadcasters (“TV Stations”) support the requests of the National Association of Broadcasters (“NAB”)¹ for a temporary partial exemption and a limited waiver of the Commission’s accessible emergency information requirements. These comments are timely filed pursuant to the Media Bureau Action in the above-referenced dockets.²

First, the TV Stations support the NAB’s request for a six-month partial exemption of the requirement to provide an aural representation of visual emergency information on a secondary audio stream until November 26, 2015. This requirement simply is not something that a television station can implement itself with its own personnel. The new rule is not a workflow or a paperwork requirement that we can implement alone, but something that requires that equipment vendors provide equipment, which must then be tested to work within a broadcaster’s extensive and complicated technical plant. While equipment vendors have been working hard to meet the existing May 26 deadline, appropriate equipment has only just recently become available to stations for testing or may not become available for testing until the middle of May. Moreover, for many of the TV Stations, their physical plant is not standardized across the entire company platform, which requires the TV Stations to review and test different vendor equipment in order to implement the solution that works for their different station platforms. Accordingly, despite the diligent efforts of vendors and stations, not all stations will manage to have fully operational, fully tested equipment in place by that date.

Second, while the TV Stations support the accessibility of maps and other graphical elements for their visually-impaired viewers, appropriate technology has not yet developed to allow television stations to effectively comply with this requirement. Without vendors providing a product to accomplish the Commission’s goals, the TV Stations are concerned that local news teams will simply remove maps or other graphics from breaking news alerts rather than attempting complicated workarounds to manually describe such graphics in the heat of a breaking news moment. The TV Stations, of course, support the accessibility of our news product to all of our viewers, but must recognize the realities of technological limitations and the allocation of resources during breaking news situations.

Finally, the TV Stations support NAB’s request to remove school closing information as information that must be conveyed in the secondary audio stream. In markets with many different school systems (for example, in New England where schools are based at the town level) or markets which cover expansive geographic territory (*e.g.*, many DMAs in the West) the audio version of the school closings

¹ National Association of Broadcasters, Petition for Temporary Partial Exemption and Limited Waiver, MB Docket No. 12-107 (filed Mar. 27, 2015) (“Petition”).

² Media Bureau Seeks Comment on National Association of Broadcasters’ Petition for Waiver of Accessible Emergency Information Requirements, DA 15-394, MB Docket Nos. 12-107, 11-43 (rel. March 30, 2015).

could go on far past the program in which the scroll airs, potentially depriving consumers of other important information in the program.

For the reasons described above and those provided by NAB, the TV Stations ask that the Commission grant NAB's Petition.

Very truly yours,

/s/

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