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July 9, 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

Re: IP-Transition - Notice of Ex Parte Submission, GN Docket No. 13-5

Dear Ms. Dortch:

On July 7, 2015, I met with Michele Berlove, Daniel Kahn, Mike Ray, Randy Clarke, and Heather Hendrickson with the Wireline Competition Bureau, and Karen Peltz-Strauss, Suzy Rosen Singleton, Greg Hlibok, Eliot Greenwald, Caitlin Vogus, and Elaine Gardner with the Consumer and Government Affairs Bureau to discuss the IP transition as it relates to broadcast captioners.

The meeting focused on the growing problem that much of today's captioning data is transmitted via old POTS lines, but when captioners' phone lines are switched to IP lines, the switch often causes the data to become incompatible with many of the encoders currently used by broadcasters. This can lead to complicated situations where the captioner may need to quickly work with a phone company to switch their phone lines back to POTS or even find a replacement captioner. Likewise, captioners who move to newer apartment complexes and those in specific areas may not have the option of POTS available to them.

In the most extreme cases, captioners may be unable to provide captioning for very specific broadcast stations or programs because of where they live as POTS lines may not be available in specific locations in the country. Further, with so much of broadcast captioning done remotely, neither the broadcaster nor the captioner may know that service changes to the captioner are occurring.

There are solutions that can be implemented to help address this problem. Typically, they involve coordination between caption providers and the broadcaster to ensure a smooth transition when a new encoder is purchased. All modern caption encoders with HD capability have the

ability to receive and transmit captions through IP delivery. With the onus to provide broadcast captioning falling on broadcasters, it is important that they work with their captioning providers to allow captions to be transmitted via IP. Captioning done over IP can also be more reliable than POTS. Captioning signals can often be rerouted, causing issues on the captioners' end and a potential disturbance in the captioning signal.

Per the recommendation by the FCC, NCRA will be reaching out to the National Association of Broadcasters to start a dialogue on this issue. NCRA previously has worked on publicizing this issue with the Society of Broadcast Engineers in an effort to ensure that the threat of a service interruption is minimized.

NCRA will, as the national organization representing individual broadcast captioners, help educate its members as to what type of notice they may receive should a phone company decide to change its phone system from POTS to IP to ensure that captioners understand the complicated technical language that is being used, as well as the real-world implications that these changes may have on their day-to-day job. Ideally, the FCC will be able to provide a sample notice that can be distributed to individual captioners.

NCRA looks forward to working with related organizations and the FCC on this matter to ensure that we do not see disruptions in captioning or any limiting of the pool of captioners who currently are working in the marketplace.

If you have any questions, please contact me directly at 703-584-9059 or afinkel@ncra.org.

Sincerely,

/s/

Adam Finkel
Director, Government Relations
National Court Reporters Association

CC: Meeting attendees