

November 3, 1999

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Magalie Roman Salas
Office of the Secretary FCC
The Portals
445 Twelfth Street S.W. Room TW-A325
Washington DC 20554

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RE: ET Dkt. No. 99-254

Comments on the Notice of Proposed Rulemaking issued by the Federal Communications Commissions (FCC) regarding

Closed Captioning Requirements for Digital TeleVision (DTV) equipment.

Pennsylvania Parents of Deaf and Hard of Hearing Children (PPDHHC) hereby submits reply comments on the Notice of Proposed Rulemaking issued by the Federal Communications Commission on July 14, 1999 regarding closed captioning requirements for digital television equipment.

We are a state wide organization of families and professionals committed to enhance parents knowledge, understanding and confidence in providing total quality participation of our children in education, family and the deaf and hearing communities. We are interested in our children's educational, communication, personal and social needs now, so they may grow to be successful deaf and hard of hearing adults.

We encourage the FCC to develop new closed captioning standards for digital equipment. We are in support of the

Electronics Industry Alliance developed standards, EIA-708 in full, not a portion. We believe the full EIA-708 standards will enable our children to take full advantage of the new digital technologies. The failure to adopt the full standards during design stages of this new digital equipment is nonsensical and impedes the progress of deaf and hard of hearing children and adults. As we understand, if the FCC adopts only Section 9 (and not the whole EIA-708 standard), the FCC will be taking action that conflicts with the policies stated in its own new Section 255 rules. These rules require manufacturers to incorporate access as early and as consistently as possible, in the design stages of manufacturing equipment.

It is critical that our children are enabled to take advantage of new technologies.

Please consider our following comments:

1. Size of captions should be changeable - for low vision people and for some senior citizens.
2. Background color should be changeable - to create contrasts against various backgrounds and for color sensitive people, such as color blindness.
3. Font should be changeable -again for low vision people.

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4. Number of Captioning Services - currently decoders are required to decode captioning data for 2 captioning services at the same time, but most TV receivers can decode up to 4 captioning streams. If the proposed standard -Section 9- is adopted then only one stream would be utilized, such as English OR Spanish, etc.
5. Dual Mode Receivers: should be required in DTV receivers to operate in analog and digital as we go through the transition from analog to digital TV.
6. DTV Converter Boxes and Tuners - should require DTV converter boxes and tuners to decode closed captions in either the analog or digital format regardless of the size of the television that the converter or tuner is connected.
7. Additional Standards:
 - a) If captions are chosen by the viewer, they should not cut off when the television is turned off or the channel is changed, so that the viewer does not have to turn the "captioner" on each time a channel is changed or the television is turned off and on.
 - b) The captioning feature and the mute feature should not be connected. A viewer should not have to turn on mute to receive captions. This makes it impossible for a mixed (hearing and non-hearing) audience to watch television together.
 - c) It should be easy to access captions through a button on the remote, and through a first menu choice. This is important in locations where the viewer is not familiar with the television equipment, such as hotels.

Thank you for the opportunity to express our comments.

Adopt the full recommendations of the Electronics Industry Alliance (EIA-708) in its entirety, regarding closed captioning of digital television.

Sincerely,



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