

March 17, 2003

Federal Communications Commission  
445 12th Street, SW  
Washington, DC 20554

**Re: CS Docket 97-80 and PP Docket 00-67**

To the Honorable Chairman and Commissioners of the FCC:

I would like to bring a closed-captioning issue up to your attention. I believe that, from review of the proposed FCC regulatory design for provision of CC in the upcoming digital TV (DTV) era, hearing-impaired and deaf citizens are about to lose out.

First, I would like to commend each one of you for aggressively pursuing the incorporation of CC circuitry into DTVs, as you and your predecessors have done with analog TVs. My wife and I are both hearing-impaired, and we are very dependent on CC (as are many of our friends and associates.) Our son, who is 3 years old and has normal hearing, has also benefited from CC in associating spoken words with the on-screen captioning.

As a consumer who would like to be one to help this nation reach the 85% DTV-in-household goal by 2006, I'm seeing that there is a fundamental problem with simply requiring the CC circuitry in tuner devices, rather than in the monitor (display or end-unit) itself. This problem is due both to:

- the trend toward physical modularization of audio-visual components by electronic manufacturers (as evidenced by plasma and other display devices) and,
- the isolation of the CC circuitry to within the tuner itself, which is geared only to receive broadcast signals (whether over-the-air, or cable, or satellite.), and
- the routing of new digital inputs around (bypass) the tuner's CC circuitry.

As you know, VCR and DVD players, as well as desktop cable converters, not being tuner devices or having CC decoding circuitry, cannot produce closed captioning. When connected to an analog input (such as coaxial or antenna inputs), broadcasts and movies may display captioning in the signals from these devices. This is because this connection goes through the tuner CC circuitry which is required by law to decode CC whenever activated and present in the signal.

However, when hooking up these devices to the display's or digital tuner's advanced digital circuitry, the ability to decode and display CC is lost. Why? These advanced input ports, such as component video and DVI (or DVI-HDCP), bypass the tuner itself. Without an intervening decoding device in these input circuit pathways, the display cannot display captioning. ***The proposed plug-and-play technology should also be thoroughly scrutinized given this revelation.***

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I ask you to review this matter and consider revising the proposed regulations to force the incorporation of CC circuitry into the display units, so that they may present CC from all current and future digital inputs. My concern is that hearing-challenged viewers will either be forced to spend more of their hard-earned dollars to be able to view CC via digital signals, or to forego joining the digital revolution altogether.

Sincerely,

Rich Baudisch  
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