

In response to the question regarding whether there is a need to adopt certain standards for non-technical quality of closed captioning related to transcription accuracy – YES! There is a huge variance in captioning quality/accuracy. Some programs (live and pre-recorded) are fairly good, while others are the just the opposite. My (hearing) husband dislikes captioning greatly for one reason when he hears the dialogue and then reads the captioned rendering it's often quite disparate. Many times I'm not even able to figure out what word was intended in the context of the dialogue. I'm told that often people will be talking and large chunks of dialogue will be left out. I am not qualified to respond to the potential cost implications, however, feel it's not fair to caption providers who do a superior job to allow those who are sloppy to be considered equally in compliance.

End-users can not pick and choose which captioning provider we prefer, we must rely on the broadcasters. Therefore, the Commission should require on-going, captioning quality studies of broadcasters. A "study" could be defined to include certain features such as: groups of paid participants doing "X" number of in home standards checks for "X" number of caption providers; end users (along with broadcasters) would develop a list of quality criteria to rate caption providers on; these studies would then be used to determine which caption providers best meet expectations of end-users. The result is the development of a new industry standard, for example, the FCC then only recognizes caption providers with a quality rating of "X" or better. If the score is less, the caption provider is not "compliance quality" and can not be used by broadcasters. Broadcasters and caption providers will then have more finite terms to base business decisions upon and end-users will have more consistent, higher quality captions.

I agree that the Commission SHOULD require video programming distributors to file compliance reports as to the amount of closed captioning they provide. How else will/does the Commission currently keep track of this?