

Before the  
Federal Communications Commission  
Washington, DC 20554

In the Matter of )  
Closed Captioning of Video Programming )  
 ) CG Docket 05-231  
Telecommunications for the Deaf, Inc )  
Petition for Rulemaking )

Reply Comments of WRGB

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Closed Captioning of most all TV programming is a goal that has benefits for both program providers and hard-of-hearing consumers. It may be possible that the goal of 100% captioning can be achieved economically. We have a unique concept that we feel needs to be considered by the Commission.

Until now, the methods of closed captioning have been restricted to two basic types, real-time, and the electronics newsroom technique. The possibility of voice recognition has been mentioned, but the method has limitations and appears to be not ready for real-time captioning replacement at this time. ENT has the advantage of low cost and lack of homophone problems but does not do well with unscripted portions of a program. Real time can be used for unscripted segments, but is costly, prone to homophone problems, and cannot deal with uncommon words that are not known prior to a live broadcast.

Voice recognition is currently available that can learn and transcribe known voices. This means that it may be able to be used to caption the meteorologist because his voice is used every day, but not the mayor who appears in a newscast only occasionally. The software has set-up limitations and needs to be configured in advance for the next voice that it would be used to caption. In this mode and because of the delays in switching between known individuals, voice recognition by itself is not yet a good solution for closed captioning of news programs.

Another method that has been suggested is the use of speech recognition by using the voice of a person who echoes the words that are spoken during the program. This scheme could be used to eliminate the software limitations to the unknown voice problem in speech recognition. Unfortunately, we do not know how much training of the "echo talker" would be necessary for this method to be useful, nor do we have any data about the accuracy and efficiency of this plan. We assume that echo talking for an entire live broadcast would be a mentally challenging task.

These circumstances suggest that a combination caption system can be devised. We will call this the Hybrid method. ENT techniques would be used for scripted segments, voice recognition of the meteorologist is used during weather, and echo talking is configured for unscripted interviews. A person would be needed to control the voice recognition computer

and do the echo talking. That person would also need to follow the script and listen to the program audio. Currently many stations use a teleprompter operator to advance the script and the teleprompter equipment feeds a serial data copy of the script to the closed captioning encoder. If that person were also used as the echo talker, as well as controlled the voice recognition computer, and had a data switch to change between captioning methods for the various segments, an entire newscast could be captioned. Any added cost would depend on the style of the operation and would vary from equipment and software costs only to these costs plus one moderately trained individual to operate the Hybrid system.

The current real-time requirement for closed captioning in markets 25 or larger has prevented these major market stations from trying other ways such as echo talking to fulfill the closed captioning requirement. Smaller market stations do not have the resources to fully develop a completely new captioning method such as the proposed Hybrid method. There are several advocate organizations that are petitioners to this proceeding who could be called upon to develop this system and verify if Hybrid captioning is viable.

We suggest that the Commission specifically allow stations and program producers to experiment with alternative captioning methods such as the proposed Hybrid method. Current rules do not address such systems and by default, they are not allowed. We also ask that the Commission require that organizations who petition for expanded captioning participate in development of voice recognition or similar systems that would expand the closed captioning of programs. We feel that this can be done without the excessive costs of real-time stenographers.

Respectively submitted,

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