

- 1. Should the FCC establish quality standards for non-technical aspects of closed captioning such as accuracy of transcription, spelling, grammar, punctuation and caption placement?** Having made captioning mandatory with no apparent regard to the limited technology available or the cost of providing the service, the FCC should keep a low profile on issues like grammar, punctuation and spelling. While captioning, to the extent possible, should reflect the actual meaning of the audio content, the FCC must keep in mind that much captioning must be done in real time; accordingly, should the FCC adopt any standard, it should be general in nature, rather than impose strict requirements (caption writers are doing the best they can and do not need the FCC to impose any standards that do not go to the substance of the captioning).
- 2. Is there a need for mechanisms and procedures, over and above the closed caption pass through requirement, to prevent technical problems from occurring and to expeditiously remedy any technical problems that do arise (e.g., obligations of video programming distributors to monitor and maintain their equipment and signal transmissions)?** Other than requiring that all parties in the program distribution chain are required to pass through closed captioning, there need not be any additional obligation.
- 3. Should the FCC establish specific per violation forfeiture amounts for non-compliance with the captioning rules?** Any forfeiture amount should be subject to the reasonable good faith actions of the video program distributor. For example, if a television station made a good faith effort to caption programming or to pass through captioning, but the caption stream was missing, it should not be fined for airing a program without captioning as airing the programming should be the first priority.
- 4. Should video program distributors be required to file closed captioning reports?** No.
- 5. Should the programming stream on a multicast signal constitute a separate channel or should all multicast program streams, including the primary program stream, constitute a single channel for purposes of determining whether the digital channel produced 3 million dollars or more in revenue and would not be exempt from the closed captioning rules?** We think the dollar limit should apply to individual multicast channels beyond the primary program service.