

Proceeding Number: 05-231

Date: 11/30/2010

Below is a canned message from NAD which I agree with, along with some of my own comments first.

MY COMMENT

"Roll up" caption (i.e often used for news) must not be allowed on NON-LIVE shows. Many broadcasters are turning to this style of captioning because it is cheaper. Problem with using this is that timing is a little off when it comes to determining who said what. This makes it hard to follow who is saying what. Positioning of caption is also lost, making it difficult to follow who is speaking as well.

FCC must disallow broadcasters for using rollup for non-live shows.

FCC also needs to establish quality of captioning too. Lately, as shows have gone digital, captioning timing are incorrect. Too many times, caption pop on and off very quickly, not giving viewer enough time to read. During the analog age, captions were left on a little longer.

There should be fines for both said issues above in order to encourage broadcasters to do the right thing.

CANNED COMMENT

Closed captioning ensures equal access to television information, news, and entertainment. As a deaf/hard of hearing person, I rely on television captioning every day.

I support the comments submitted by the National Association of the Deaf (NAD) and other consumer groups:

Closed captioning rules must be changed to require real-time captioning for local news programs nationwide.

The FCC must establish minimum standards for closed captions.

Closed captions should be monitored to find and fix problems quickly.

Closed caption compliance reports should be filed every three months.

The FCC should establish fines for closed captioning violations.

Broadcasters with more than \$3,000,000 revenue per year must caption the programs on all of their "multicast" channels, not just their main channel.

Sincerely,

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