



August 12, 2011

Marlene H. Dortch, Esq.  
Secretary  
Federal Communications Commission  
445 12th Street, SW  
Washington, DC 20554

Re: Notice of Ex Parte Communication, MB Docket No. 11-43

Dear Ms. Dortch:

On August 11, 2011, Jane Mago and the undersigned of the National Association of Broadcasters (NAB) met with Erin McGrath, Acting Legal Advisor, Media, in the Office of Commissioner McDowell.

The purpose of the meeting was to discuss the rules governing the implementation of Video Description, MB Docket No. 11-43. We reiterated our position that, due to the significant technical challenges, as well as the realities of the broadcast network program production process, video description programming requirements should not become effective until October 1, 2012.<sup>1</sup> We also discussed the issues surrounding the technical capability of pass-through requirements for stations outside the top 25 markets, the 2000 Order, and Congressional timetables as contemplated by the Twenty-First Century Communications and Video Accessibility Act of 2010. *Id.* at p. 14.

Finally, we discussed specific technical recommendations of the ATSC DTV standard A/53, issues surrounding subsequent airings and the interrelationship of Spanish language programming, definitions of live and near-live programming, and mobile DTV service. *Id.* at pp. 7-8, 21-22, 16-17, and 22-23, respectively.

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<sup>1</sup> See Comments of the National Association of Broadcasters, In the Matter of Video Description: Implementation of the Twenty-First Century Communications and Video Accessibility Act of 2010, MB Docket No. 11-43, April 28, 2011 at pp. 15-17.

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Please direct any questions regarding these matters to the undersigned.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Ann West Bobeck". The signature is stylized, with a large, looped initial "A" and a horizontal line extending from it.

Ann West Bobeck  
Senior VP and Deputy General Counsel  
Legal and Regulatory Affairs

cc: Erin McGrath