

September 22, 2011

Ex Parte via Electronic Filing

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

Re: *Closed Captioning of Internet Protocol-Delivered Video
Programming: Implementation of the Twenty-First Century
Communications and Video Accessibility Act of 2010,
MB Dkt. No.11-154*

Dear Ms. Dortch:

On September 20, 2011, Adrienne Biddings, Kenneth Carter, Naomi Black, Ken Harrenstien and Gina Scigliano of Google Inc., met with Jeffrey Neuman, Walid Kossem, Michelle Carey, Steven Broeckaert, Lyle Elder, Diana Sokolow, Alison Neplokh and John Wong from the Media Bureau, Roger Holberg with the Consumer and Government Affairs Bureau and Ira Keltz and Alan Stillwell from the Office of Engineering and Technology to discuss the above reference proceeding.

Google encouraged the Commission to be forward looking in its implementation of internet protocol closed captioning standards. By not mandating a particular standard, software developers have the ability to innovate and create new applications for closed captioning as technology evolves.

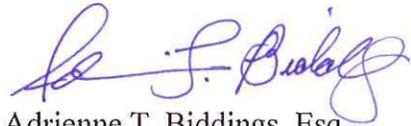
Google explained to the Commission that the best solution would be for video programmers to create caption files with open, publicly specified formats, and that to require hardware and device manufacturers to provide available application programming interfaces (APIs). Such APIs could meet the functional requirements for closed captioning so that closed caption information originally developed for broadcast television may be provided to consumers on internet devices with no loss of function or content. As long as the format of the captioning information is well-specified, and publicly defined, APIs are available for controlling the hardware necessary to display and interact with captions and video platforms can readily support the functional requirements demanded by consumers. A framework that incorporates open, publicly available APIs and formats is the least burdensome and most efficient way to ensure that developers meet their accessibility obligations and gives innovators the flexibility to drive captioning support across multiple platforms.

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Pursuant to the Commission's rules, this notice is being filed in the above-referenced docket for inclusion in the public record. Please contact me directly should you have any questions.

Respectfully Submitted,

A handwritten signature in blue ink, appearing to read "A. T. Biddings".

Adrienne T. Biddings, Esq.
Telecom Policy Counsel

cc: Jeffrey Neuman
Walid Kossemm
Michelle Carey
Steven Broeckaert
Lyle Elder
Diana Sokolow
Alison Neplokh
John Wong
Roger Holberg
Ira Keltz
Alan Stillwell