

**To:** Federal Communications Commission

**CC:**

Jeffrey Neumann  
Michelle Carey  
John Wong  
Diana Sokolow  
Eliot Greenwald  
Rosaline Crawford  
Steven Broeckaert  
Mary Beth Murphy  
Alison Neplokh  
Thomas Apone

**From:**

Nicholas Reville  
Executive Director  
Participatory Culture Foundation  
<http://pculture.org>

October 5, 2011  
Notice of an Ex Parte Presentation

To Whom It May Concern:

Thank you for giving me a chance to present the work that my organization, Participatory Culture Foundation, a 501c3 public charity, is doing on captioning and subtitling of web video.

We spoke on October 4, 2011 by teleconference. Present on the call were myself, Jeffrey Neumann, Michelle Carey, John Wong, Diana Sokolow, Eliot Greenwald, Rosaline Crawford, Steven Broeckaert, Mary Beth Murphy, Alison Neplokh, and Thomas Apone. I provided information about our captioning / subtitling software service, Universal Subtitles (<http://www.universalsubtitles.org>) and offered perspective on the rulemaking that the FCC is undertaking regarding new captioning requirements for online video. Additional information about our service and its usage is available at our website. In short, Universal Subtitles makes it possible for individuals or organizations to caption and translate almost any online video.

Our service has been rapidly adopted by a wide variety of people, not-for-profit, and for-profit organizations, which use our tools to caption and subtitle videos about any subject imaginable, to provide accessibility to the deaf and hard of hearing and to translate across languages. We have focused on building easy to use and flexible software that can help eliminate the complications and difficulties that have made captioning and subtitling rare on the web.

Giving the pace of change on the web and the need to offer both standardized and flexible approaches to caption support for software and devices, the FCC faces a formidable task in defining rules in this space. I offered the following suggestions on our call, which I think are important considerations during this process:

- We believe that subtitles should generally be delivered in a separate file from the video itself,

in order to provide maximum flexibility for delivery and display, across a range of software and devices.

- Technically, it is relatively easy to provide support for subtitles (translations of a video) if captioning support is already provided. If the rules could require or recommend support for subtitles as well as captions, many more Americans will be able to enjoy videos in languages that they do not speak, and very little additional burden will be placed on technology providers.
- To the largest extent possible, requirements should be developed in coordination with or in compliance with the standards-setting bodies of the World Wide Web. Support for captions that is based on open web standards will be the most successful, flexible, and most readily supported by various software developers.

Please feel free to contact me if you would like any additional information about our work or if we can be of help in any way.

Sincerely,

A handwritten signature in black ink, appearing to read 'N. Reville', with a stylized, cursive script.

Nicholas Reville