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June 8, 2012

VIA ELECTRONIC FILING

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

Re: Notice of *Ex Parte* Communication, MB Docket No. 11-154

Dear Ms. Dortch:

On June 6, 2012, we met on behalf of Hulu, LLC with Diana Sokolow, Jeffrey Neumann, Michelle Carey, Alison Neplokh, Mary Beth Murphy, and Steven Broeckaert of the Media Bureau and Karen Peltz Strauss, Rosaline Crawford, and Eliot Greenwald of the Consumer and Governmental Affairs Bureau.

We explained that Hulu is a strong supporter of improving access to video programming for the deaf and hard of hearing. Since Hulu's inception, it has expanded captioning across its video offerings. Currently, a majority of full episode views have captioning capability, and hundreds of hours are invested per month to improve the quality of captions within video programming delivered via Internet protocol.

We then shared our understanding that, pursuant to the "safe harbor" provisions of Section 79.103(c)(11) of the Commission's rules, a video programming distributor that provides applications or plugins may satisfy the obligations related to the captioning display functionalities listed in Section 79.103(c) of the rules by implementing the Society of Motion Picture and Television Engineers ("SMPTE") Timed Text format (SMPTE ST 2052-1:2010).

Finally, we explained that because Hulu is committed to providing a high-quality consumer experience, it dedicates significant resources to ensuring the precise synchronization of the caption files and video programming that it ingests. We explained that in many cases Hulu must manually synchronize captions to video programming in a process that is highly labor-intensive and time consuming. Therefore, due to the high volume of programming that Hulu receives, there may be a delay between the time video programming is posted online and the time captioning becomes available.

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FCC staff asked to arrange a follow up telephone call with the Hulu engineering staff in order to learn more about Hulu's applications and Hulu's tools for synchronizing video programming and caption files. We are in the process of identifying dates and times when Hulu personnel can be available, and we will follow up with the staff shortly. Hulu looks forward to continue to work with FCC staff on these important matters.

Respectfully submitted,

Hulu, LLC

By: 

Mace Rosenstein
Lindsey Tonsager

Its Attorneys

cc: Diana Sokolow
Jeffrey Neumann
Michelle Carey
Alison Neplokh
Mary Beth Murphy
Steven Broeckaert
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