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COPY

BEFORE THE

Federal Communications Commission

Washington, D.C. 20554

FILED/ACCEPTED

In the Matter of

Los Angeles Unified School District)
Video Programming Accountability)
Updated Petition for Exemption)

JUL - 5 2012

Federal Communications Commission
Office of the Secretary

To: Disability Rights Office, Room 3-B431

PETITION FOR EXEMPTION

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Date: July 5, 2012

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BEFORE THE

Federal Communications Commission

In the Matter of

Los Angeles Unified School District)
Video Programming Accessibility)
Petition for Exemption From Closed)
Captioning Requirements)

To: Disability Rights Office, Room 3-B431

PETITION FOR EXEMPTION

The Los Angeles Unified School District ("LAUSD"), licensee of Noncommercial Educational Television Station KLCS, Los Angeles, California (FCC Facility ID No. 38430), by its counsel, pursuant to 47 C.F.R. Section 79.1(f) of the Commission's rules, hereby petitions the Commission for an exemption, effective as of July 5, 2012, from the closed captioning requirements insofar as LAUSD produces, owns, and distributes video programming on Station KLCS. This Petition requests a blanket exemption from the closed captioning rules or, alternatively, requests exemption on a program-by-program basis from the closed captioning rules, as explained more fully herein. LAUSD seeks this exemption with regard to the programming which it presents on a primary and three multicast channels. For the reasons explained below, LAUSD submits that compliance with the closed captioning rules would pose an "undue burden" upon it (see 47 C.F.R. Section 79.1(f)(1) and 47 U.S.C. Section 713(d) and 713(e)), and

therefore the requested exemption would serve the public interest and should be granted.¹ In support, the following is stated.

Summary

The Los Angeles Unified School District ("LAUSD") operates the largest public school system in Los Angeles County, Los Angeles, California. It also operates Noncommercial Educational Television Stations KLCS-TV/DT ("KLCS"), Los Angeles, California, for the purpose of educating students (in the classroom and at home), and providing information to adults regarding the plans, programs, and deliberations of LAUSD, and other educational and informational matters.

LAUSD hereby petitions the Commission to grant it an exemption from the closed captioning rules which went into effect on January 1, 2006. Those rules which would require all video programmers and distributors to close caption all "new" English-language programming, except for programming (and programmers) exempted from the closed captioning requirements under 47 C.F.R. Section 79.1(d).

LAUSD seeks an "undue burden" exemption under 47 C.F.R. Section 79.1(f). In this Petition, LAUSD addresses the four factors for "undue burden" (based on financial circumstances) set forth in 47 U.S.C. Section 713, and 47 C.F.R. Section 79.1(e). To summarize briefly: (1) LAUSD operates KLCS as a Noncommercial Education: Television Station; (2) Based on programming during the second quarter of 2012, it is estimated that Station KLCS will present somewhat less than 675 hours of nonexempt uncaptioned programming per year subsequent to July 5, 2012; (3)

¹ LAUSD recognizes that Section 79.1(f)(1) states that the provider "may petition the Commission for full or partial exemption." While LAUSD believes that it is entitled to "full exemption," obviously it would 'accept partial exemption and the consequences to viewers resulting from the loss of programs for which exemption was denied.

LAUSD estimates that it would cost approximately \$54,000 for Station KLCS to close caption all of its programming which is not currently closed captioned; and (4) Station KLCS operates on a very tight budget, and if it were required to close caption all programming which is not currently captioned it would pose an "undue burden" on KLCS' finances and ability to serve the public.

LAUSD supports the laudable goals of 47 U.S.C. Section 713, which directed the Commission to establish closed captioning regulations for video programmers and distributors. But LAUSD management has taken this laudable goal into account in determining the current level of closed captioning on Station KLCS. With due respect to the Commission and its authority and mandate, LAUSD respectfully requests that under principles of providing programming oriented to the stakeholders of the Los Angeles market LAUSD's decisions regarding closed captioning should be give substantial deference by the Commission. The decisions reflected in the current closed captioning schedule of Station KLCS were made by experienced management, in full appreciation of the general desirability of closed captioning (about which there is not disagreement whatever). These decisions were made, however, not based exclusively on the general desirability of providing closed captioned programming, but in the context of the severe budgetary limitations under which Station KLCS must operate, and management's deliberate weighing of the myriad of highly laudable, but necessarily competing, expenditure possibilities for which limited public funds are available.

The LAUSD receives over 80 percent of its General Fund from the State of California. The total 2011-12 LAUSD General Fund was \$6.5 billion. Taken together over the last 5 years, LAUSD has had to manage a combined State funding shortfall of over \$2.6 billion. State funding for education has suffered cuts of 16%, beginning in 2008-09. No other area of the State Budget has experienced the same level of cuts. California is ranked 46th in the nation in funding per student and 50th in student to teacher ratios. The LAUSD is made up of five basic divisions. (Superintendent,

Instruction, School Operations, Strategy and Facilities) These divisions are broken into 34 sub-divisions. Station KLCS receives LAUSD funding through the Superintendent Division, Communications sub-division. The State shortfalls each year have been absorbed by these individual divisions but not equally. The Instructional Division, which includes classroom teachers initially, was spared the deepest cuts. Since 2008 LAUSD has had nearly 8,000 full time employee layoffs. The current projected shortfall for 2012-13 projects a potential loss of nearly an additional 6,700 full time employees. The LAUSD employee labor units including teachers just approved ten unpaid furlough days for the 2012-13 school year for all employees to limit staff reductions. This will require the school year to be shortened by two weeks. The LAUSD asks the Commission to respect the difficult budgetary decisions made by LAUSD and which are reflected in its budget, and not to, in effect, substitute its (the Commission's) judgment for those of LAUSD. As to the later, in all probability, such programming would be cancelled.

I. Background

A Petition for Exemption was filed December 12, 2005 and a Supplement was filed on March 17, 2006. The programs for which exemption is being sought here in is substantially similar to the programs reflected in the December 2005 Petition and March 2006 Supplement.

Effective as of January 1, 2006, all video program producers and distributors were required to close caption all "new English-language programming" which did not fall within one of the specific "exemptions" set forth in 47 C.F.R. Section 79.1(d). However, in addition to authorizing the Commission to exempt "by regulation" certain "programs, classes of programs, or services" from its closed captioning requirements, Congress expressly authorized the Commission to consider petitions for exemption submitted by interested parties upon the claim that, under the relevant facts and circumstances of the specific situation, the requirement for closed captioning would result in an

"undue burden." See 47 U.S.C. Section 713(d)(3). The term "undue burden" is defined in 47 U.S.C. Section 713(e) as meaning "significant difficulty or expense."

In 47 U.S.C. Section 713(e), Congress articulated four factors which are to be considered in making "undue burden" determinations based on "expense,"² and these factors are set forth in haec verba, in the corresponding Commission rule (47 C.F.R. Section 79.1(f)(2)). The factors are as follows:³

- (1) the type of operations of the provider or program owner;
- (2) the nature and cost of closed captions for the programming;
- (3) the financial resources of the provider or program owner; and
- (4) the impact of closed captioning on the operation of the provider or program owner.

II. Consideration of the Four Statutory/Regulatory Factors

Factor 1: Type of Operations of LAUSD/KLCS

LAUSD is charged by law with the responsibility to operate the largest elementary and secondary public school system in Los Angeles County, California, and is the second-largest school system in the United States.⁴ LAUSD is responsible for providing the best possible education to more than 664,233 elementary and secondary school students, who reside in an area consisting of more than 700 square miles. LAUSD operates these educational opportunities in more than 1,000 school facilities (including programs for K-12, early childhood development,

² Type of undue burden is referred to in 47 U.S.C. Section 713(e) as "undue economic burden."

³ This is the order in which the four statutory considerations are addressed in this Petition. These factors are set forth in a different sequence in 47 U.S.C. Section 713(e), and in 47 C.F.R. Section 79.1(f)(2). Under 47 C.F.R. Section 79.1(f)(3), parties are allowed to provide other information which they believe is relevant to their "undue burden" exemption requests.

⁴ LAUSD provides services to all of the cities of Cudahy, Gardena, Huntington Park, Lomita, Maywood, San Fernando, Vernon, and West Hollywood, and to part of the cities of Alhambra, Bell, Bell Gardens, Beverly Hills, Calabasas, Carson, Commerce, Culver City, Downey, El Segundo, Hawthorne, Inglewood, Long Beach, Los Angeles, Lynwood, Montebello, Monterey Park, Ranchos Palos Verdes, Rolling Hills Estates, Santa Clarita, Santa Monica, South Gate, South Pasadena, and Torrance.

and adults). In addition, as part of its mission, LAUSD is the licensee of, and operates, Noncommercial Educational Television Station KLCS. Station KLCS provides pertinent educational and informational programming to students in classrooms and at home, programming of interest to the general public which will enable viewers to understand the mission of the LAUSD, its plans, and its programs, and other educational and public interest programming. See further discussion under Factor 3 and Factor 4, below.

Factor 2: Nature and Cost of Closed Captioning for Station KLCS Programming

Supplied as Attachment 1 to Station KLCS', General Manager, Sabrina Thomas's Statement is a list of the uncaptioned programming of Station KLCS during the second quarter of 2012 (April – June, 2012) for which exemption is sought by LAUSD for the period commencing July 5, 2012.⁵ A review of this report shows that during this quarter, a total of 13 regularly-scheduled programs, 6 annual programs (some of which are rebroadcast), and 6 specials and special series, were presented on Station KLCS without close captioning. The station's 2012 schedule (and subsequent periods) has not been finalized but it is expected to be substantially similar to the programming reflected in Attachment 1 to the Statement of Sabrina Thomas. Hence, it is reasonable to assume that the non-captioned programming for the third quarter of 2012, and the amounts of time devoted to those programs and series,⁶ as reflected on Attachment 1 to the Statement of Sabrina Thomas, is generally representative of Station KLCS' plans regarding future.

During the second quarter of 2012, Station KLCS broadcast approximately 470 hours of

⁵ In situations where KLCS knows of non-captioned programs that were broadcast in the second quarter of 2012 which will either not be broadcast in the third quarter of 2012, or which will be programmed with captions by the programmer, it has omitted the programs from the list supplied with this Petition.

⁶ Note that although Attachment 1 identifies only programming broadcast during the second quarter of 2012, information regarding the total amount of time devoted to these programs and program series is for the entire year (2012).

non-captioned "new" realtime programming, and approximately 235 hours of non-captioned offline (i.e. taped) programming. For, illustrative purposes, the Commission's attention is directed to the five (5) non-closed captioned programs and special series that Station KLCS broadcast for at least 30 hours during 2012, which are described below:

1. Los Angeles Unified School District Board and Committee Meetings

Regular Committee Meetings, Special Committee Meetings, and Standing Committee meetings of the Board of Education of the City of Los Angeles are broadcast live two times per week (Tuesday and Thursdays), and rebroadcast on Sundays. Each program is approximately 3 hours 30 minutes in duration. Total time: 420 hours per year.

2. LAUSD Update with John Deasy

Dr. John Deasy (current LAUSD Superintendent of Schools) discusses matters of interest to Los Angeles parents, educators and administrators. Program is broadcast live one day per week (Monday) and is repeated on Sunday. Each program is a 1/2 hour in duration. Total time: 30 hours per year.

3. Homework Hotline

Provides homework assistance to middle and high school students. Locally produced educational programming. Each program is 30 minutes in duration, and is broadcast four times per week. Total time: 46 hours per year.

4. LA36/KLCS Game of the Week

LAUSD City Section high school athletic contest of the week. Locally produced sports program, which is originally broadcast on the City of Los Angeles cable channel (LA36), and is rebroadcast on Station KLCS. This program is approximately 2 hours in duration, and is broadcast one time per Week. Total time: 30 hours per year.

5. Learning English

Provides viewers with beginning English lessons, which includes grammar, vocabulary and sentence structure, and is presented in the context of familiar situations in daily life. This program is distributed to other stations. Each program is 30 minutes in duration, and the program is broadcast 4 times per week. Total Time: 40 hours per year.

LAUSD is concerned most, of the foregoing programs, as well as the other programs and series reflected on Attachment 1 to the Statement of Sabrina Thomas, may not be within any of the designated exemptions to the closed captioning rules as set forth in 47 C.F.R. Section

79.1(d). Hence, absent the grant of an "undue burden" exemption under 47 C.F.R. Section 79.1(f)(1-3), and the interim status provisions set forth in 47 C.F.R. Section 79.1(f)(11), in the absence of being granted a full exemption LAUSD will be required to discontinue all of the non-exempt programs, commencing July 5, 2012, due to lack of funding. A prime example of this concern are the LAUSD Board and Committee Meetings, which was broadcast by Station KLCS 420 hours during 2012. As this weekday (Tuesday and Thursday) program is repeated on Sundays, it appears that this program would not qualify under 47 C.F.R. Section 79.1(d)(8) as being a "local, non-news program with no repeat value" (emphasis supplied). See, Implementation of Section 305 of the Telecommunications Act of 1996-Video Programming Accessibility (Order on Reconsideration), 13 P& F CF 887, at 906 (Paragraph 61) (1998).

LAUSD appreciates, of course, that if the Commission were to determine that some or all of the programming reflected on Attachment 1 to the Statement of Sabrina Thomas falls within one of the Section 79.1(d) exemptions, or in the event a program is captioned by the program producer at some future time, the instant request for exemption under the "undue burden" provision of Section 79.1(f) would, to that extent be mooted, and that the projected additional cost for close captioning would be reduced accordingly". However, as the Commission has not clarified the scope of these exemptions, it is not definitely possible for LAUSD to know with confidence whether any one (or all) of these programs and program series is/are exempt. Therefore, LAUSD/KLCS must seek blanket exemption for the station's currently non-captioned programming and, in the event such exemption is not granted, exemption for each program in Attachment 1 to the Statement of Sabrina Thomas.⁷ The programs and descriptions significantly

⁷ LAUSD expressly reserves the right to contend, at some future time, that any or all of the programs and specials reflected on Attachment 1 of Sabrina Thomas's Statement falls within one of the regulatory exemptions set forth in 47 C.F.R. Section 79.1 (d).

show that Station KLCS is meeting its obligation to the stakeholders (students, parents and other members of the public) in the Los Angeles community.

There are three alternative ways Station KLCS could provide closed captioning for its currently non-closed captioned programming. Voice recognition systems claim high accuracy rates, but this approach is not feasible because none of Station KLCS' productions take place in the kinds of controlled environments which are needed to make this approach feasible. The station could hire additional personnel for this purpose. This approach would require the hiring of a minimum of two fulltime additional staff persons, at a salary of approximately \$75,000 per person (including benefits), for a total cost of approximately \$150,000 per year. Finally, the station could contract closed captioning services to outside entities. It has determined, based on estimates received from vendors, that the cost of close captioning realtime programming would be approximately \$55 per hour; hence, the estimated yearly cost for closed captioning the Station's 469.50 hours per year of currently non-closed captioned realtime programming would be approximately \$26,000. It has further been determined, based on estimates from vendors, that it would be reasonable to expect the cost of closed captioning offline programming would be approximately \$120 per hour; hence, the estimated cost for closed captioning the Station's 234.5 hours per year of currently non-closed captioned offline programming would be approximately \$28,000 per year. The sum of these figures places the total cost of obtaining closed captioning services from outside sources at approximately \$54,000 per year. See the Statement of Sabrina Thomas and Attachment 2 as regards to captioning proposals submitted by vendors. With the current financial condition of the LAUSD and Station KLCS, the alternative options are not financially viable and any programming that does not receive an exemption would need to be removed from the broadcast schedule.

Factor 3: Financial Resources of Station KLCS

Approximately 67% of Station KLCS' current fiscal year funds (the subdivision funds from the Superintendent's division) come from the budget of LAUSD, which in turn receives approximately 80% of its revenues from the State of California. The remaining 33% of Station KLCS' current year budget comes in the form of grants (mainly from the Corporation for Public Broadcasting). The entire current year budget of Station KLCS is allocated to the operation of Station KLCS, with no portion set aside for capital expenditures. The operational budget of Station KLCS has been decreased by 86% (a total of \$4,413,096) since 2000. These reductions have been partially offset by cost of living adjustments to salaries and benefits, LAUSD's funding of previously unfunded positions, and adjustments to production activity by Station KLCS. However, these offsets have not mitigated the impact to Station KLCS' operations from the budget reductions, as they merely corrected budget shortfalls.

The total budget currently available to Station KLCS from all sources is \$3,934,639, all of which is available for operational expenses (\$2,645,680 from the LAUSD and \$1,288,759 from grants). Seventy-one percent of this budget is encumbered for payroll expenses and there are no funds earmarked for capital improvements. The cost of Closed Captioning is included in operational expenses which are being reduced by 47%. For the upcoming FY 2012 – 2013, Station KLCS will see its funding from the LAUSD reduced 47% to \$1,403,437 from \$2,645,680.⁸ Together with new and carryover grant funds, the projected total budget of Station KLCS in 2012 – 2013 will be \$3,418,081.² All but \$12,240 of this budget is already encumbered in payroll, program acquisition, and other critical items.

⁸ The referenced \$2,645,680 is the allocation of funds received from LAUSD, Superintendent division.

² FY 2012-2013 starts as of July 1, 2012

Factor 4: Impact of Additional Closed Captioning Requirements on the Operation of Station KLCS

As noted, the estimated cost of closed captioning the Station KLCS programming which is currently not closed-captioned would be approximately \$150,000 if additional staff were hired or close to \$52,000 if closed captioning services were obtained from third parties. These figures represent approximately 4.3% and 1.5%, respectively, of Station KLCS' projected budget of \$3,418,081 for the upcoming 2012-2013 fiscal year. However, as noted above, all but \$12,240 of this projected budget is already encumbered in payroll, program acquisition, and other critical expenses. To reiterate, Station KLCS is projecting an available balance of just \$12,240 for use on all existing expenses for FY 2012 – 2013. Station KLCS simply does not have the financial resources to closed caption its currently non-closed captioned programming were it compelled by the Commission to do so.

Further exacerbating the situation is the fact that Station KLCS is already burdened by the demand to program a primary and three additional channels as a result of digital conversion. Nearly all of Station KLCS' funds not committed to payroll items are expended to acquire programming for this purpose. In addition, Station KLCS is constrained by collective bargaining agreements in making budget decisions related to personnel, which currently accounts for 71% of Station KLCS' total operating budget. (\$2,781,002 of \$3,934,639)

There is little doubt, therefore, that diversion of resources to closed captioning would not only be extremely difficult and painful but, most probably, impossible for Station KLCS to absorb and will have a devastating effect on the Station. For this reason, LAUSD is submitting this "undue burden" petition pursuant to 47 C.P.R. Section 79.1(f).

KLCS has sought additional sponsorship resources of revenue for closed captioning by hiring a part time Development Director and additionally started for the first time in the Station's 40 year

history presenting pledge drives as of June 2012. KLCS has also put social media and telephone donation programs in place in April of 2012 but the results are still too preliminary to report.

III. Standard under which the Commission Should Evaluate LAUSD's Petition

With due regard for both the laudatory goals which led to the enactment of 47 U.S.C. Section 713, and the responsibilities and authority of the Commission, LAUSD submits that the Commission should, as a policy matter, and in keeping with the basic principle of localism, give considerable deference to the budgetary decisions and priorities of LAUSD as reflected in its current budget and this Petition. The management of Station KLCS has made determinations of the amount and type of programming for which it has funds to closed caption, and these decisions are reflected in the current schedule of Station KLCS' closed captioned programming. There is no inconsistency whatever between LAUSD's full support of the laudatory goals of 47 U.S.C. Section 713, and the extent to which Station KLCS' programming is currently closed captioned. The decisions reflected in the current closed captioning schedule were made by management in full appreciation of the general desirability of closed captioning (about which there is no disagreement whatever); however, these decision were made in the context of the severe budgetary limitations under which Station KLCS must operate, and management's deliberate weighing of the myriad of highly laudable, but necessarily competing, expenditure possibilities for which limited public funds are available.

For the reasons explained above, LAUSD firmly believes that the additional closed captioning requirements which go into effect July 5, 2012 will, in fact, pose an "undue burden" on Station KLCS. LAUSD respectfully asks the Commission to respect LAUSD's decision in this regard, and not, in effect, to substitute the Commission's judgment for the judgment of LAUSD as regards closed captioning. While LAUSD does not suggest, much less does it contend, that its (LAUSD's) judgment on this matter should be automatically approved by the

Commission, it does believe that the Commission should, as a matter of policy, give substantial deference to LAUSD's professional and experienced judgment in this regard, because LAUSD - not the Commission is in the best position to allocate scarce resources available to Station KLCS among the many worthwhile and inevitably competing possible line item expenditures for which Station KLCS' funds might be devoted. Further, as it is LAUSD which bears the responsibility to provide education for the students of the area which it serves, and is responsible to the local citizenry in regards to its performance, it is fitting that the Commission give considerable deference to LAUSD's decisions regarding the nature and extent of closed captioning on Station KLCS.

In sum, due consideration to the principle of providing programming oriented to the stakeholders of the Los Angeles market particularly as it here involves the allocation of very limited primarily public funds for a quintessential local public service - i.e., television programming specifically devoted to the education of young students, and associated programming to inform the public of the policy issues and decisions of local public officials regarding such educational matters-should be a powerful influence in the direction of leading the Commission to defer to the budgetary judgments of LAUSD as regard to the nature and extent of closed captioning on Station KLCS.

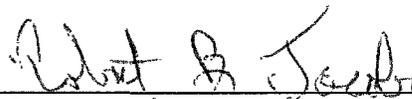
CONCLUSION

For the foregoing reasons, LAUSD submits that the Commission should accept LAUSD's showing that it would impose an "undue burden" for Station KLCS to comply with the Commission's requirements regarding its currently non-closed captioned programming. Accordingly, LAUSD believes that the Commission should, pursuant to the authority granted to it by Congress in 47 U.S.C. Section 713 of the Communications Act, effective as of July 5, 2012,

grant LAUSD a blanket exemption from the requirements of 47 C.F.R. Section 79.1 of the Commission's rules; alternatively, and in the event a blanket exemption is not granted, LAUSD believes that the Commission should grant LAUSD an exemption, on a program by program basis, for each of the currently non-closed captioned programs identified in Attachment 1 of Sabrina Thomas's Statement with the understanding that any programs not found exempt will be removed from the airwaves. (and comparable programs as might be added to Station KLCS' programming in the future).

Respectfully submitted

LOS ANGELES UNIFIED SCHOOL DISTRICT



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(202) 452-4812

Its Counsel

Date: July 5, 2012

Statement Under Penalty of Perjury

My name is Sabrina Thomas, and I am the General Manager of Station KLCS, Los Angeles, California, which is licensed and operated by the Los Angeles Unified School District. I have held my current position of General Manager since July 2011.

I have directed our communications to counsel to prepare the forgoing Petition for Exemption as regards to Station KLCS' compliance with the Commission's closed captioning rules, effective January 1, 2006.

Following this Statement are two Attachments. Attachment 1 is a listing of the Station KLCS non-captioned programming during the period April – June 2012 and to be prospectively aired in the future. Attachment 2 is a collection of proposals from vendors regarding their proposed charges to close caption programming at Station KLCS. These letters were solicited by Station KLCS in connection with this Petition.

At my request, Thomas Taitt, KLCS Broadcast Compliance Specialist, and others on the staff of Station KLCS have assisted and have worked directly with our communications counsel in the preparation of the information in the Petition and the Attachments. I have reviewed the foregoing Petition and the Attachments and the facts stated therein are true and correct to the best of my knowledge, information and belief.

Executed under penalty of perjury this 28th day of June, 2012.



Sabrina Thomas

Commission's rules; alternatively, and in the event a blanket exemption is not granted, LAUSD believes that the Commission should grant LAUSD an exemption, on a program by program basis, for each of the currently non-closed captioned programs identified in Attachment 1 of Sabrina Thomas's Statement with the understanding that any programs not found exempt will be removed from the airwaves. (and comparable programs as might be added to Station KLCS' programming in the future).

Respectfully submitted

LOS ANGELES UNIFIED SCHOOL
DISTRICT


Sabrina Thomas, General Manager

Date: June 28, 2012

Attachment 2

Taitt, Thomas

From: Rossolyn Turner <ezcaptioning@aol.com>
Sent: Thursday, June 07, 2012 9:36 AM
To: Taitt, Thomas
Subject: Captioning services

Follow Up Flag: Follow up
Flag Status: Flagged

Good morning, Mr. Taitt!

Per our conversation yesterday I have listed our fees for captioning services. Please let me know if I can be of further service to you.

You will find our prices are quite competitive!

Our off-line prices do not include the price of the equipment. We are waiting for an updated price from our provider and should be able to get back to you by Monday.

Real-time services = \$55 an hr.

Off-line = \$120 an hr.

Remember, captioning is EZ with EZ Captioning!

Rossolyn Turner, Director
EZ Captioning & Court Reporting
951-496-8618