

11421 Viridian Way  
Austin TX 78739

Received & Inspected  
AUG 17 2012  
FCC Mail Room

August 16, 2012

Office of the Secretary  
Federal Communications Commission  
Attention: Disability Rights Office, Room 3-B431  
9300 East Hampton Drive  
Capitol Heights, MD 20743

RE: Case Identifier #: CGB-CC-1196 for television program *Open House ATX*

Enclosed you will find my petition for further review in regards to the exception to closed captioning for television programming. In this petition you will find that I have sought closed captioning assistance from my video distributor LIN Media. Their letter states that they can charge me for closed captioning, however the fee is more than my cost for television airtime. As noted in my original petition I am a small business and closed captioning each of my nine *Open House ATX* programs would be economically burdensome. This shows that my programming will not be shown if it is required to provide captions.

Also enclosed are emails from various other independent closed captioning services describing their fees and time of delivery for programs. Once again, due to the fees that will be incurred, using these services would prevent my programming from being aired on television.

I have asked my sponsors for assistance for closed captioning. Enclosed is a letter from my primary sponsor The Austin Real Estate Experts real estate group part of Keller Williams Realty. Again, with a proposed rate increase to cover the cost of closed captioning I would loose my primary sponsor and thus prevent me from airing my programming.

*Open House ATX* is a local real estate show that showcases featured real estate listings from local real estate agents. The program offers graphic lower third text where any viewer may visit the real estate agent's web page or MLS listing website for more written details about the homes that are being showcased. As such, homes that aired on television require timely airtime to help the real estate agent market the home efficiently and effectively. A delay in airing the programming would render my program useless to agents needing to market and sell properties.

Sincerely,



Ron Yakerson

DIGITAL EXPOSURE

***Enclosures (3 with supplemental material)***

MS  
8-16-12



August 3, 2012

Ron Yakerson  
Digital Exposure  
11421 Viridian Way  
Austin, Texas 78739

Ron,

Regarding your inquiry as to the cost of closed captioning your paid programming on stations, the weekly cost per program would be \$60, which is MORE than the \$50 you are paying to air each program. The cost is high due to the fact that each show will have to be first transcribed, and then entered into the system. The process is very labor intensive and again, due to the number of programs you air, would take a good deal of time on our end. If there were an internal way around this be assured that I would take it as you are a long time customer of our stations. However, the situation is as it is. Let me know if there is anything I can do on this end.

Thanks for your continued business!

Steve Stites  
Account Executive  
LIN Media Austin

MS  
8-16-12

# The Austin Real Estate Experts

Dear Ron,

It has come to our attention that there is a proposed rate increase related to cover costs associated with close captioning. This increase would create an undue hardship on Greg and I as sponsors of the show, as we have not budgeted for this in our business plan. We would love to remain on as sponsors of the show, and appreciate the closed-captioning feature, but cannot sustain a rate increase and still participate.

Sincerely,

Matt Menard and Greg Young

**KELLER WILLIAMS**

1335 E. Whitestone BLVD ste Z-200 Cedar Park, Texas 78613  
Office: 512.616.4032 Fax: 512.616.3983

MS  
8-16-12

*Each office is independently  
owned and operated*

"Client Sales and Services (common mailbox)" <CSS@vitac.com>

VITAC Caption Quote

Hi Mauricio! Thank you for contacting VITAC!

Our rate for English realtime (live) captioning is \$150 per hour. This includes pre-event setup and testing paired with captioning by the best captioners in the industry. We're also happy to offer encoder and audio coupler rental, caption transcripts, and timecoded text files for an additional charge.

For more details and to book your event, please contact me at 724-514-4077 or [clientservices@vitac.com](mailto:clientservices@vitac.com). To provide a detailed quote I will need to know the date and time of your program or event and any additional services you may need.

Our rate for offline captioning is \$300 (roll-up) to \$600 (pop-on) per hour. You can see examples of each of the styles on our web site: [http://www.vitac.com/services/broadcast\\_captions.asp](http://www.vitac.com/services/broadcast_captions.asp)

I also have encoding rates if you'd like for us to handle encoding the files for the programs you're looking to have done offline.

Are both of your shows ongoing series? I see one is a showcase of homes and the other is talk show offering real estate tips.

Let me know if you have any questions and let us know when you'd like to get started.

I look forward to working with you and hope to hear from you soon!

Ryan Nickoli  
Client Sales & Services Representative  
**VITAC**  
*A Merrill Communications Company*

**Captioning. Done. Right.**

1325 G Street NW, Suite 200  
Washington, DC 20005  
CSS Hotline: 724-514-4077  
Ofc: 202-697-4500  
Fax: 202-879-8491  
[www.vitac.com](http://www.vitac.com)

This message is intended only for the use of the Addressee and may contain information that is PRIVILEGED and CONFIDENTIAL. If you are not the

\*\*\*\*\*

How will you be affected by caption mandates for IP-delivered programming? Use our [overview and flowchart](#) to find out.

PKS  
8-16-12

Emily Bell <emily@captionmax.com>  
T.J. Mauricio Gonzalez  
captions for Open House ATX

August 16, 2012 12:19 PM

Hi, Mauricio.

Thank you for the information about your project. For a series of half-hour programs, we can create roll-up closed captions for \$175 per episode or pop-on closed captions for \$275 per episode. This includes script import if you have one or professional human transcription if you don't, caption timing and formatting, PreciseCheck, and export of a caption data file such as an .scc.

You can see the difference between the two caption styles in our [sample gallery](#). Roll-up is more commonly used for documentary-style programming, while pop-on is the style that is more easily conformed to subtitle or webcast formats.

If you would like us to insert the caption data into your H.264 video as a Closed Caption Track, we can do that for an additional \$125 per file. Or you can do that on your end with the .scc file using Apple Compressor.

Videos can be uploaded to our easy-to-use [website](#). Standard turnaround is about 3 business days but we can meet virtually any turnaround request, and we can give you a more specific estimate when we know more about your delivery schedule.

For live captions of prescheduled English-language programming, we can supply a certified realtime writer for \$75 per half-hour. We would just need an audio feed for the writer and the IP address or modem number of the closed caption encoder.

Please let me know if there are any questions I can answer for you or if there's anything else we can provide.

Thanks.  
Emily

Emily Bell  
Multimedia Manager  
[CaptionMax](#)  
direct: 612.556.1030  
mobile: 612.341.3555

PLS  
8-16-12

Kara Stark <kara@automaticsync.com>  
 mgb@exposeyourmedia.com  
 Captioning services with AST

August 16, 2012 9:42 AM

2 Attachments 165 KB

Mauricio Gonzalez,

Thanks for your inquiry today regarding captioning and transcription requirements for your organization. AST was funded through the US Dept of Education to create a captioning system that is cheaper, faster, and easier to use than traditional captioning.

Our system is entirely electronic - users submit content for captioning over the web and we will return caption results electronically. We can return a variety of result types, including caption files for podcasts, web media (QuickTime, Windows Media, Real, Flash), DVD authoring (caption and subtitle files), videotape encoding, and broadcast captioning. We also offer a number of other formats to support GoogleVideo and video search functions. You can get multiple caption result formats at no additional cost - you can request as many formats as you like.

We also offer transcription-only services if you are just after a transcript. We make extensive use of automation technologies to get the cost low, but our transcription is done by trained stenographers; we do not use speech-recognition technology to generate the transcripts due to the high error rate that such technology suffers from.

I have attached an overview of our system and our price sheet. As you can see, we charge \$184.80 per content hour (\$3.08 per minute) for transcript and caption files and we offer over 50 output types, all listed at  
 We are integrated with a wide variety of video platforms and lecture capture systems. We offer services in English and Spanish.

To create an account on our system, please fill out the form at \_\_\_\_\_

Please email or call me if you have any questions. Thanks!

Kara Stark  
**Automatic Sync Technologies**

Phn: 877-278-7962 x715



**Automated Captioning & Transcription Pricing**

AST's CaptionSync web-automated captioning is straightforward and simple and significantly faster and less expensive than alternative captioning methods. Because CaptionSync is a web-based service, there is no software to purchase, and it is always available.

Simply upload your media to our CaptionSync server and select whether you want captioning, transcription, or both (a transcript is required in order to create caption output). The outputs you select are returned electronically -- no need to ship anything.

	<u>Captioning Only</u> (have transcript)	<u>Transcription Only</u>	<u>Captioning &amp; Transcription</u> (need transcript)	<u>Production Transcripts</u> (time stamped)
Immediate Turnaround	\$1.48 / minute			
Standard 3-day Turnaround <sup>5</sup>		\$1.60 / minute	\$3.08 / minute	\$2.25 / minute
RUSH 24-hour Turnaround <sup>5</sup>		\$2.16 / minute	\$3.64 / minute	\$2.81 / minute

Prices are per minute of media.

Bulk pricing is available for purchases of more than 10 hours; contact us for details.

MS  
8-16-12

- 1 AST will endeavor to caption all content submitted to our system, but content with excessive music or noise may not be captionable by the AST system. Captioning charges only apply for successfully captioned content; failed captioning attempts do not incur caption fees. If you request a transcript, and your content is not captionable, you will receive only the transcript, and you will be billed only for the transcription portion of the fee.
- 2 Billing resolution is one minute, all submissions are rounded up to the next nearest minute.
- 3 On approval of credit, terms are Net 30. Invoices are issued monthly.
- 4 AST makes many caption output formats available; there are no additional charges for requesting and receiving multiple output formats for submission.
- 5 The turnaround time for transcription is normally less than three business days. RUSH transcription is one business day.
- 6 Pricing is for caption and/or transcript files for media content that has been electronically submitted to CaptionSync. Call us if you need assistance with other aspects of captioning, including digitization of analog media, audio extraction for formats not supported automatically by our website, or encoding of the final media (which may be required for some media formats).
- 7 You may pre-purchase time on the CaptionSync server in order to take advantage of volume discounts or if you do not have credit approval with us. Pre-purchased CaptionSync time is non-refundable and expires five years after purchase if not used. The minimum transaction for pre-purchase is \$75.
- 8 Prices are valid through Sept 30, 2012.
9. All prices are in US Dollars.

CaptionSync™ US Pricing Captioning-Transcription

PKS  
8-16-12