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August 27, 2012

Ex Parte via Electronic Filing

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

Re: *Implementation of Sections 716 and 717 of the Communications Act of 1934, as Enacted by the Twenty-First Century Communications and Video Accessibility Act of 2010*, CG Dkt. 10-213; *Amendments to the Commission's Rules Implementing Sections 255 and 251(a)(2) of the Communications Act of 1934, as Enacted by the Telecommunications Act of 1996*, WT Dkt. 96-98; *In the Matter of Accessible Mobile Phone Options for People Who Are Blind, Deaf-Blind, or Have Low Vision*, CG Dkt. 10-145

Closed Captioning of Internet Protocol-Delivered Video Programming: Implementation of the Twenty-First Century Communications and Video Accessibility Act of 2010, MB Dkt. 11-154

In the Matter of Structure and Practices of the Video Relay Service Program, CG Dkt. 10-51

Dear Ms. Dortch:

On August 23, 2012, Google Inc., represented by Adrienne Biddings and Naomi Black of Google, and the undersigned, met at Google's offices in Washington, D.C. with Karen Strauss, Deputy Chief, Consumer and Governmental Affairs Bureau ("CGB"), Gregory Hlibok, Chief, CGB Disability Rights Office, Eliot Greenwald, Rosaline Crawford, and John Herzog of the CGB Disability Rights Office, and Henning Schulzrinne, Chief Technology Officer, Office of Strategic Planning & Policy Analysis.

The purpose of the meeting was to demonstrate features of Hangout Captions, an application that integrates live transcription services directly into a Google+ Hangout, the web-based multi-user video chat application, to improve accessibility for participants who are deaf or hard of hearing. Hangouts were launched just over a year ago, as a core part of Google+. Using Hangout Captions, a video chat participant is able to connect live text from a professional transcriptionist to his or her Hangout, or to type directly into a text box to transcribe a Hangout for other participants. As demonstrated at the meeting, Google can support adding an interpreter to a Hangout (via a voice telephone call using standard ten-digit dialing to a Video Relay Service ("VRS") number). Google also can support adding Computer Assisted Real Time ("CART")

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transcription to a Hangout, while making the video of all participants in a Hangout available to all of the participants simultaneously, which is a particularly useful feature for deaf or hard of hearing persons who may not know American Sign Language. Google does not charge participants in a Hangout for the use of its video application.

Google explained that because the application programming interface (“API”) for Hangouts developed by Google is open and publicly available, any developer is free to innovate and improve the user experience within Hangouts. Google’s public API allows anyone to integrate proprietary technology with Google+ Hangouts, to enhance the experience of participants in multi-user video sessions. For example, as Google demonstrated at the NAD conference in Louisville, Kentucky earlier this year, an application developed by CSDVRS, LLC that is based on Google’s open API enables integration of VRS and video remote interpreting (“VRI”) on top of Google+ Hangouts’ common video platform. Other developers also have created useful tools, such as a hand-raising application, which can be used to help moderate conversation flow. As Google has previously observed, open, published APIs thus promote accessibility by allowing innovators to build on shared or common infrastructure and establish bridges between technologies, creating an ecosystem of video tools and technologies that everyone benefits from.

In response to questions regarding interoperable video services, Google noted that the problem of video-to-video interoperability for real time video is complex, that the technology is still emerging, and that forcing companies to adopt a single video format standard or codec to achieve video-to-video interoperability would limit innovation and reduce incentives to explore new codecs and standards that could provide greater flexibility to users. Google’s approach today is to provide a video application that anyone can integrate with or build services on top of, such as CSDVRS’s application, for example. In that case, Google+ Hangouts provided the video technology, and CSDVRS provided the specialized VRI expertise. Moreover, APIs that let VRS and CART transcription providers build on top of a common video infrastructure that has a high adoption among mainstream hearing users (rather than within a closed accessibility silo) allows these providers to focus on their specialized services, while also lowering barriers to the market because potential new entrants need not also become experts in hardware or other aspects of video technology.

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

Sincerely,



E. Ashton Johnston
Counsel for Google Inc.

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cc: Karen Strauss (by electronic mail)
Gregory Hlibok (by electronic mail)
Eliot Greenwald (by electronic mail)
Rosaline Crawford (by electronic mail)
John Herzog (by electronic mail)
Henning Schulzrinne (by electronic mail)