



January 29, 2013

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

Re: Notice of Ex Parte Communication, MB Docket No. 12-107

Dear Ms. Dortch:

On January 25, Kelly Williams and the undersigned of the National Association of Broadcasters (NAB) met with Steven Broeckaert, Maria Mullarkey, Mary Beth Murphy, Alison Neplokh, Jeffrey Neumann and Diana Sokolow of the Media Bureau and Rosaline Crawford (via teleconference), Eliot Greenwald and Karen Peltz Strauss of the Disability Rights Office, Consumer and Government Affairs Bureau.

The purpose of the meeting was to discuss the rules governing the implementation of Accessible Emergency Information, MB Docket No. 12-107. We discussed in detail the significant technical and operational challenges associated in developing and deploying an integrated solution for creating the audio representation of an emergency crawl. We explained that to comply with this new emergency information requirement, stations must be able to convert emergency crawl graphics into audio, route that audio through their facilities and encode that audio onto a secondary audio stream for transmission over the air. In a typical broadcast television station, the graphics for an emergency crawl may originate from varying sources around the facility.<sup>1</sup> Depending on a number of circumstances regarding how the station responds to a specific emergency event, the crawl may be created in the news room, in master control, in the weather center or originate from the station's Emergency Alert System equipment. While text-to-speech (TTS) technology and software is available, there is currently no methodology for interfacing the output of the graphics equipment (*i.e.*, the crawl itself) to such TTS equipment.

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<sup>1</sup> See Comments of the National Association of Broadcasters, In the Matter of Closed Captioning of Internet Protocol-Delivered Video Programming Implementation of the Twenty-First Century Communications and Video Accessibility Act of 2010, MB Docket No. 12-107, Dec. 18, 2012 at 10-12.

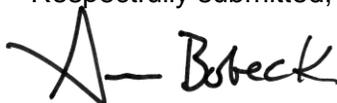
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Accordingly, the Commission should adopt a phased-in approach to allow industry to implement the new rules in a reasonable manner.<sup>2</sup> Moreover, as the Commission implements this important phase of the Twenty-First Century Communications and Video Accessibility Act of 2010 (CVAA), it should afford broadcasters sufficient flexibility to continue to innovate their multiplatform video programming, serve their audiences during emergencies and avoid stifling such innovation as an unintended consequence of any new rule. Thus, we urge the Commission to refrain from requiring or precluding any technology for audio transcription. *Id.* at 14-15.

Please direct any questions regarding these matters to the undersigned.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Ann West Bobeck". The signature is stylized with a large, looped initial "A" and a long horizontal stroke extending to the right.

Ann West Bobeck  
Senior VP and Deputy General Counsel  
Legal and Regulatory Affairs

cc: Diana Sokolow

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<sup>2</sup> *Id.* at 17-20. We ask that the Commission afford broadcasters in the top 25 markets that already have a secondary audio stream 36 months from Federal Register publication of the adopted rules to come into compliance. Broadcasters in the top 25 markets that currently lack a secondary audio stream will require sufficient time to make the necessary upgrades to their equipment, as will broadcasters in smaller markets (*i.e.*, markets below the top 25) with more limited resources. The Commission should provide these broadcasters (top-25 market broadcasters without a secondary audio stream, and broadcasters in markets below the top 25) 42 months from Federal Register publication of the rules to come into compliance.