

February 22, 2013

BY ELECTRONIC FILING

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

Re: *MB Docket No. 12-107*

Dear Ms. Dortch:

As discussed in its February 7, 2013 *ex parte* filing, DIRECTV transmits national cable channel on a nationwide satellite beam, while it transmits local broadcast stations on localized spot-beams. DIRECTV would thus face considerable challenges if required to make localized emergency information on national cable channels accessible to the visually impaired in the manner proposed in the *NPRM*.

The record in this proceeding includes a filing by The Weather Channel discussing its localization strategies and the obstacles it would face in implementing an accessibility solution.¹ DIRECTV, for its part, has developed a method to provide localized information from The Weather Channel (such as tornado warnings) to subscribers in the affected areas. Below, DIRECTV describes this method in greater detail, and also offers a proposal for increasing the accessibility of such alerts for the visually impaired.

* * *

Each DIRECTV subscriber needs at least one-set top box, which is used to decode the signal transmitted via satellite. This sophisticated equipment is capable of interacting with the DIRECTV transmissions to customize a subscriber's experience in certain ways. Among other things, a subscriber is able to enter her zip code into the set-top box in order to achieve such customization.

Using that information, an application designed by DIRECTV enables the set-top box to pull localized alerts from the national Weather Channel feed for the zip code provided by the subscriber. When the subscriber first tunes to The Weather Channel, if there is an alert in effect for her area, it is presented as a visual weather alert banner at the top of the screen, with a

¹ See Letter from David J. Wittenstein to Marlene H. Dortch, MB Docket No. 12-107 (filed Jan. 16, 2013).

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direction to press the red button on the handheld remote control for further information. If the subscriber is already tuned to The Weather Channel when the alert is issued, this banner replaces the local weather information normally presented at minute :03, :13, :23, etc. Figure 1 below illustrates what such an alert banner looks like on a subscriber's television. This alert is also accompanied by a series of three tones similar to that used by broadcasters to alert viewers with visual impairments to the presence of emergency information.



Figure 1. Illustration of Weather Alert Banner

When the subscriber hits the red button on the remote control, she is taken to an alert page that provides additional detail related to the weather conditions in her area. Figure 2 below provides an illustration of this page. At present, there is no audio accompanying this information. However, DIRECTV believes that for many of its set-top boxes, it would be possible to add an audio message to capture the nature of the weather emergency. For example, in the case depicted in Figure 2, the DIRECTV set-top box could be pre-loaded with a message that would say: "A tornado watch is in effect for your area." While this audio information would not provide exactly the same information that is presented visually, the satellite capacity and other resources necessary to convey that additional information – including audio to cover over 3,000 counties nationwide and the full spectrum of times during which an alert could be in effect – would be prohibitive. Moreover, locational information is largely unnecessary given that the on-screen alert will only be picked up by set-top boxes in the affected zip codes.



Figure 2. Illustration of Weather Alert Detail Page

Modifying the Weather Channel application to enable such audio functionality would not be easy, however. It would require a new design to deliver the necessary audio files, as well as additional satellite bandwidth to cover applications on both the high definition and standard definition Weather Channel feeds. Moreover, because of the limitations of non-DIRECTV middleware used in some set-top box models (especially those used for standard definition services), the proposed changes could not be implemented on all equipment. Nonetheless, DIRECTV believes that it could enable a majority of its set-top boxes with this emergency audio capability within three years. Adding such capability to the audio tones that accompany existing alert banners would improve accessibility of emergency information supplied by The Weather Channel for many DIRECTV subscribers who are visually impaired.

Respectfully submitted,

/s/

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cc: Michelle Carey