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February 22, 2013

VIA HAND DELIVERY

FILED/ACCEPTED

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

FEB 22 2013

Federal Communications Commission
Office of the Secretary

**Re: BBC Worldwide Limited
Supplement to Petition for Exemption
From Closed Captioning Requirement
REQUEST THAT CONFIDENTIAL FINANCIAL AND
COMPETITIVE INFORMATION BE WITHHELD FROM
PUBLIC INSPECTION
CG Docket No. 06-181; File No. CGB-CC-1277**

Dear Ms. Dortch:

Transmitted herewith, on behalf of BBC Worldwide Limited (“BBCWL”), is a Supplement to Petition for Exemption from Closed Captioning Requirement (the “Supplement”) in the above-referenced docket and file.

The enclosed filing has two parts: (1) an original and one copy of the Supplement suitable for public inspection, and (2) an original and one copy of the Supplement containing confidential and proprietary information, including financial information, which BBCWL requests be withheld from public inspection pursuant to Commission Rule Section 0.457.

Pursuant to Section 0.457 of the Commission’s rules, 47 C.F.R. §0.457, BBCWL hereby respectfully requests that the Profit and Loss Statement for Fiscal Year 2011/2012 for the BBC Worldwide Channels Latin America & US Hispanic operations, annexed to the Supplement as Exhibit A (the “P&L Statement”), be withheld from public inspection. The P&L Statement has been marked “PROPRIETARY AND CONFIDENTIAL – NOT FOR PUBLIC USE” and “WITHHOLD FROM PUBLIC INSPECTION.” The P&L Statement contains highly confidential and proprietary financial information about BBCWL and its expenses, revenues and losses, which, in the ordinary course, would be protected from public disclosure. BBCWL requests that the P&L Statement be withheld from public disclosure until such time that disclosure could no longer result in competitive harm to BBCWL.

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Request for Confidentiality
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Please date-stamp the enclosed "Return Copy" of this filing and return it to the courier delivering the package.

If there are any questions concerning this matter, please contact me.

Respectfully submitted,

A handwritten signature in cursive script that reads "Nancy A. Ory".

Nancy A. Ory

Enclosures

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

In the matter of)
BBC WORLDWIDE LIMITED)
) CGB-CC-1277
Petition for Exemption of)
Closed Captioning Requirement)
)
To: The Commission

**SUPPLEMENT TO PETITION FOR EXEMPTION FROM
CLOSED CAPTIONING REQUIREMENT**

BBC Worldwide Limited (“BBCWL”), owner and operator of CBeebies, a Spanish-language television channel which provides programming targeted to preschool-age children (“CBeebies” or the “Channel”), by its attorneys and pursuant to Section 79.1(f) of the Commission’s rules, hereby submits this Supplement to Petition for Exemption from Closed Captioning Requirement (the “Supplement”). BBCWL filed its original Petition for Exemption from Closed Captioning Requirement on November 19, 2012 (the “Petition”). This Supplement is being filed in response to a letter dated January 23, 2013 from the Consumer and Governmental Affairs Bureau (“CGB”) of the Federal Communications Commission (“Commission”) (the “CGB Letter”) in which the CGB requested that BBCWL submit additional information. Specifically, the CGB requested that BBCWL submit (i) documentation of its financial status sufficient to demonstrate its inability to afford closed captioning, and (ii) verification that it has sought closed captioning assistance from its video programming distributors. BBCWL hereby supplements its Petition to submit the requested information.

I. Documentation of Financial Status

Submitted herewith as Exhibit A is a Profit & Loss Statement for Fiscal Year 2011/2012 for the BBC Worldwide Channels Latin America & US Hispanic operations (the "P&L Statement"). The P&L Statement covers three BBCWL channels that are distributed through Latin America & US Hispanic operations, including CBeebies.¹ As demonstrated on the P&L Statement, the channels collectively show a [REDACTED] (before interest, taxes and exchange revaluations) of [REDACTED] for Fiscal Year 2011/2012.

II. Requests for Captioning Assistance

BBCWL has sent correspondence to each of the multichannel video programming distributors ("MVPD") that carry CBeebies' in the United States requesting closed captioning assistance. No MVPD has responded positively to this request. See Declaration of Mr. Alexander Torres, submitted herewith.

III. Additional Information

As noted in the Petition, CBeebies' programming in the United States is targeted at a discreet, and unique, audience: children ages six and under who speak Spanish in their homes. Clearly, children of that age, regardless of language spoken, have little, if any, reading ability. This is obviously an instance where the benefits of captioning will not offset the economic burden that would be imposed by a captioning requirement, as there will be virtually no benefit provided by the captioning. Moreover, due to the strictures of British law and the policies of the BBC, to which BBCWL must conform, CBeebies is unable to seek sponsorship sources for captioning. In fact, CBeebies does not offer any sponsorship opportunities, including

¹ Note that the P&L Statement covers three channels (i) CBeebies, which reaches all of Latin America and US Hispanic, (ii) BBC Entertainment, which reaches only Latin America, excluding Brazil, and (iii) BBC HD, which reaches Latin America, including Brazil. BBCWL does not have a profit and loss statement for CBeebies on a stand-alone basis.

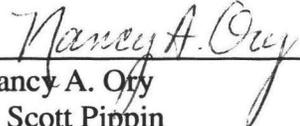
traditional “spot” advertising, in its feed to U.S. Hispanic audiences, rendering it impossible for CBeebies to seek commercially funded assistance for captioning.

IV. Conclusion

For the reasons set forth herein and in the Petition, BBCWL submits that, in accordance with the “economically burdensome” standard of the Commission’s rules, CBeebies is entitled to an exemption from the closed captioning requirement.

Respectfully submitted,

BBC Worldwide Limited

By: 
Nancy A. Ory
F. Scott Pippin
Lerman Senter PLLC
2000 K Street, NW, Suite 600
Washington, DC 20006-1809

February 22, 2013

Its Attorneys

EXHIBIT A

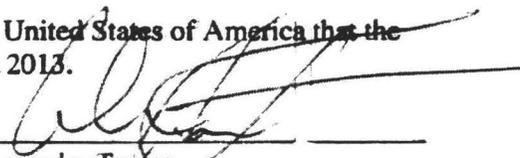
Profit & Loss Statement for Fiscal Year 2011/2012 -
BBC Worldwide Channels Latin America & US Hispanic operations

DECLARATION

I, Alexander Torres, declare the following:

1. I am Vice President, Business & Legal Affairs, at BBC Worldwide Channels Latin America & US Hispanic.
2. I have reviewed the foregoing Supplement to Petition for Closed Captioning Exemption of BBC Worldwide Limited ("BBCWL"), including the Profit & Loss Statement for Fiscal Year 2011/2012 for the BBC Worldwide Channels Latin America & US Hispanic operations (the "Supplement"). All information and statements contained in the Supplement are true and correct to the best of my knowledge and belief.
3. BBCWL has sent correspondence to multichannel video programming distributors that carry the CBeebies channel in the United States requesting closed captioning assistance and no assistance has been provided.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on February 22, 2013.



Alexander Torres
Vice President, Business & Legal Affairs
BBC Worldwide Limited