



**SPC-TV**

SOUTH PORTLAND  
COMMUNITY TELEVISION

TONY VIGUE  
Manager

W. MAURICE AMARAL  
Media Specialist

August 2, 2013

Federal Communications Commission  
445 12th Street, S.W.  
Washington, D.C. 20554

Re: *In the Matter of Accessibility of User Interfaces, and Video Programming Guides and Menus, MB Docket No. 12-108, Notice of Proposed Rulemaking (FCC 13-77)*

Dear Commissioners:

South Portland Community Television (SPC-TV) submits this letter in the above-referenced rulemaking proceeding (NPRM) in support of the comments filed by the Alliance for Community Media; the Alliance for Communications Democracy; Montgomery County, Maryland; and the National Association of Counties, National Association of Telecommunications Officers and Advisors & U.S. Conference of Mayors.

SPC-TV is a department of the City of South Portland and carries approximately 50 different local Public and Governmental Programs weekly over the Time Warner Cable system that services the City. Our programming is available to approximately 13,000 subscribers in South Portland and Cape Elizabeth, Maine.

We carry the programs "Healthy Living", "National Gallery of Art", "Peak Moment", "Army News Watch" and many others, several of which include closed captioning on our channel. However, the onscreen video programming guide of our multichannel video programming distributor (MVPD), Time Warner Cable, does not provide a label or symbol indicating that these programs have closed captions.

We have program descriptions and accessibility information readily available for our programs with accessibility options such as closed captions. However, currently, Time Warner displays only "LOCL" on the program guide. This level of information is inadequate to meet the accessibility goals of the Twenty-First Century Communications and Video Accessibility Act of 2010 (CVAA). Viewers cannot determine from the MVPD's video programming guide what our programs are and whether our programs are accessible. Thus, viewers with visual or auditory disabilities cannot make meaningful video program choices.

We urge the Commission to adopt rules that would require video programming guides and menus which display channel and program information include for all channels, high level channel and program descriptions and titles, as well as a symbol identifying the programs with accessibility options (captioning and video description).

Thank you for the opportunity to submit these comments.

Tony Vigue