



National Court Reporters Association

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EX PARTE MEMORANDUM

January 2, 2013

Ms. Marlene H. Dortch
Secretary
Office of the Secretary
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, D.C. 20554

RE: Broadcast Captioning Quality Meeting CG Docket No. 05-231

Dear Ms. Dortch,

On Dec. 20, 2013, Adam Finkel and Brandon Schall attended the Closed Captioning Quality Roundtable in person, and Dave Wenhold attended via teleconference on behalf of the National Court Reporters Association (NCRA).

Also attending the meeting in person were Aaron Garza, Eliot Greenwald, Kris Monteith, Karen Strauss, Caitlin Vogus, Greg Hlibok, Susy Rosen Singleton, Susan Aaron, Michelle Carey, Mary Beth Murphy, Steven Broecheart, and Diana Sokolow from the Media Bureau, the Consumer and Governmental Affairs Bureau, and the Disability Rights Office of the FCC. Additionally, John Ward (DirecTV), Stacy Fuller (DirecTV), Mark Turits (CBS), Anne Lucey (CBS), Hadass Kogan (DISH Network), Jill Lockett (NCTA), Diane Burstein (NCTA), Mary Crespy (Verizon), Will Johnson (Verizon), Margaret Tobey (NBCU), Jane Mago (NAB), Kelly Williams (NAB), Ann Bobeck (NAB), Claude Stout (TDI), Christian Vogler (Gallaudet, TAP), Andrew Phillips (National Association of the Deaf), Cheryl Heppner (Association of Late-Deafened Adults), Lise Hamlin (HLAA, Director), Darlene Parker (NCI), Jill Toschi (NCI), Drake Smith (NCI), Heather York (VITAC), David Talbott (AT&T), and Rick Chessen (NCTA) were in attendance.

Attending via teleconference were Blake Reid (Samuelson-Glushko Technology Law & Policy Clinic), Nick Poser (CBS), Bob Seidel (CBS), Larry Goldberg (WGBH), Amy Bowlen (VITAC), Alison Godburn (WGBH), Quang Pho (WGBH), Gerald Freda (CaptionMax), Leonardo Velazquez (AT&T), Debra Phillips (AT&T), Stephen Goldberg (AT&T), Mark Weiland (AT&T), and Robert Vitanza (AT&T).

At the roundtable, NCRA noted that many organizations have attempted to develop specific captioning metrics before but there is currently a lack of universal agreement as to *what* those metrics should be. At this point, the available options do not specifically mention the quality of the individual captioner and would not lead to better captioning quality overall. Further, NCRA urges the commission to demand near 100 percent accuracy standards for prerecorded programs.



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Additionally, multiple captioning companies have developed extensive training programs for their captioners which could reinforce highly accurate and comprehensive captions. These training programs also ensure that the captioner completely understands how to use relevant technology to ensure that technical breakdowns that occur during the process of providing live captioning are minimized and, when they do occur, they are not the fault of the captioner. Furthermore, NCRA advocated for either our Certified Broadcast Captioner certification or Certified Realtime Writer certification to be one of the eventual best practices that the Commission puts into place. This would ensure that the captioner has, at the very least, passed a minimum standard and must receive continuing education to allow them to keep their certification. One of NCRA's primary objectives is to set national certification standards for court reporters, broadcast captioners, and CART captioners. NCRA's certifications are independently accredited, and we have administered certification examinations since 1937.

Further, NCRA would like to see the Commission expand the number of media markets that require captioning for its original content beyond the top 25. Live captioners provide the most accurate and complete version of the spoken word, and multiple large communities of individuals who are deaf or hard of hearing remain without access to programs like their local news. While electronic newsroom technology has improved, it still is too inadequate to ensure that all Americans have equal access to all live broadcasted television programming.

Pursuant to the Commission's rules, this letter has been filed with the Secretary. If you have any questions regarding NCRA's captioning best practices or this submission, please do not hesitate to contact me directly.

Sincerely,

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