

February 4, 2014

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

Re: Docket No. 05-231

Dear Ms. Dortch,

The representatives of the captioning industry would like to take this opportunity to clarify one issue that was included in the captioning vendor suggested best practices document filed on January 10, 2014, in regard to proceeding number 05-231.

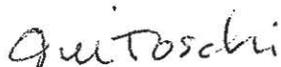
In that document, the captioning industry recommended the following formula for assessing accuracy of real-time captioning:

$$accuracy = \frac{\text{number of words captioned} - \text{number of errors}}{\text{number of words captioned}} * 100$$

This is significantly different from the formula adopted by the Canadian Radio-television and Telecommunications Commission (CRTC) and suggested in the exparte filing by the Telecommunications for the Deaf on January 17, 2014, which places the number of words in the dialog as the denominator of that equation. The captioning industry representatives do not support CRTC's method for calculating accuracy of real-time captioning, as the number of words in dialog is an ambiguous measurement dependent upon how many speakers are in the dialog and the quality of the audio source among other factors. We feel that caption quality could decrease if real-time captioners cannot employ prudent editing techniques during periods of rapid and/or difficult-to-decipher dialog.

We appreciate your consideration of this distinction as you continue your valuable work on this issue.

Respectfully submitted,



Jill Toschi