

## Comment Regarding Item No. 05-231, Standards for Closed Captioning

Sumbitted by Julian Karpoff, 33026 W. Falling Creek St., Lewes, DE 19958

Closed captioning for the deaf should be effective to achieve the intended result, that is that deaf television viewers should have substantially the same access to television as hearing persons.

The elements of proper closed captioning to achieve such access include (1) substantial simultaneity, (2) substantial accuracy, (3) reasonable screen placement, and (4) ease of access. This analysis is based on my substantial personal experience, as a hearing person, with closed captioning over several years. My wife has been effectively deaf for about 10 years and we watch television nearly every evening. We have experience with Comcast cable in Delaware and RCN cable in D.C.

1. Simultaneity. Pre-recorded shows should have total simultaneity (as well as enhanced accuracy and placement) since the distributor has the luxury of time to correlate the captioning with the underlying spoken words. Closed captioning on live shows, such as network evening news shows, presents additional challenges. However, I question whether network evening news shows are truly live, since such news shows are broadcast at different times in different markets, not counting time zone differentials. For example, particular networks broadcast the same evening news show at 6:30 p.m. EST (or EDT, as the case may be) and again at 7:00 p.m. EST/EDT in other markets. I doubt that the anchors repeat their live presentations for this purpose.

2. Accuracy. I am a keen listener but sometimes I do not catch a word or two, particularly from an accented speaker. In such cases I watch the captioning and, like as not, the captioner did not catch the words, either. However, with the luxury of time afforded with pre-recorded shows, the captioning should be edited to be 100% accurate, much as the pre-recorded show is edited. In the instance of live shows, often when difficult material, such as foreign names, is encountered, the captioning pauses, thereby aggravating the simultaneity issue. In such cases the resolution is often to skip the difficult material and some additional material to return to some degree of simultaneity. This is doubly unfair to the deaf viewer.

Further to accuracy, our Comcast cable service in Delaware carries the NBC evening news on both the NBC Philadelphia station and the NBC Baltimore station, at the same time (6:30 pm). Interestingly, the captioning on the Baltimore station is much better. How can this be? Further, why should duplicate resources be expended (and wasted) on the same effort? Why does the network supply first quality captioning with its feed to its many stations?

Also further to accuracy, some shows identify a sponsor for closed captioning. This suggests that captioning is done by the producer of each show, and not by the distributor.

3. Placement. Placement should be made so as to avoid the speaker's face and the "action" in sports shows. On news and talk shows this is generally not a problem because the video is arranged so as to center upon the speaker. As a result, the bottom or top edges of the screen are available for the captions. A problem arises when the show's video includes a banner at the bottom, such as the speaker's name or collateral information. However, the captioning should be shown over such banners, so that the deaf viewer may follow the spoken words. To identify the speaker or give collateral information at the expense of the spoken words is frustrating to the deaf viewer whose primary goal is to be able to follow the spoken words.

Further to placement, my wife and I follow the Washington Nationals baseball team on the MASN network, both on Comcast in Delaware and on RCN in D.C. The placement of the captions is far different, with the RCN captions being smack in the middle of the batter's face, or in the middle of pitching or fielding action. (Incidentally, we have the same brand televisions, Sanyo, in Delaware and in D.C.) I pursued this issue with RCN and their response that placement was a matter of the television unit. I called Sanyo on this point and their response, predictably, was that placement was controlled by the cable carrier. The second part of this submission is a photograph of a placement problem on PBS as presented by Comcast in Delaware.

4. Ease of Access. On our Delaware television, both the cable box and the television (including closed captioning) are controlled by a single remote unit, which is supplied by Comcast. This is good. On our D.C. television, the cable box and the television are controlled by separate remote units, with the result that the deaf user has to juggle to find the closed captioning control. While on vacation lately, we encountered different systems, often requiring configuration of closed captioning on both the television and on the cable remote unit. Sometimes the television set has to be configured from the set itself, not the remote. Whatever system is used should be user-friendly to the deaf television viewer and uniform.

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