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Washington, DC 20001



February 14, 2014

Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12th Street, S.W.  
Washington, D.C. 20554

**Re: *Closed Captioning of Video Programming, CG Docket No. 05-231***

Dear Ms. Dortch:

On February 12, 2014, the undersigned and Cristina C. Pauzé of Time Warner Cable had separate meetings with Courtney Reinhard of Commissioner O’Rielly’s office and with Jeffery Neumann of Commissioner Pai’s office. The undersigned also had a meeting and telephone call with Maria Kirby of Chairman Wheeler’s office and a meeting with Adonis Hoffman, Stefanie Frank, and Pauline Lee of Commissioner Clyburn’s office.

We discussed the compliance framework the Commission is developing to improve the quality of closed captions on television. We described how the companies maintain their equipment in order to pass through closed captions to subscribers and respond to issues that are identified internally or by customers. In addition, we explained how overly prescriptive maintenance, monitoring, or recordkeeping requirements would be unduly burdensome and costly without corresponding benefit.

We expressed support for the proposals submitted by DIRECTV and Dish Network<sup>1</sup> and Comcast/NBC Universal<sup>2</sup> regarding enforcement of the FCC’s quality standards for closed captioning on video programming owners. We explained the difficulty in obtaining certifications from certain video programming owners and urged the FCC to act on an expedited

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<sup>1</sup> See Letter from William M. Wiltshire, Counsel for DIRECTV, to Marlene H. Dortch, Secretary, FCC, CG Docket 05-231 (filed Dec. 9, 2013).

<sup>2</sup> See Letter from Jordan Goldstein, Comcast Corporation, to Marlene H. Dortch, Secretary, FCC, CG Docket 05-231 (filed Jan. 28, 2014).

basis to ensure that an enforcement regime that covers both video programming owners and providers becomes effective at the same time.

Please contact the undersigned should you have any questions.

Sincerely,

/s/ Alex Hoehn-Saric

Alex Hoehn-Saric  
Senior Vice President, Government Relations  
Charter Communications

cc: Maria Kirby  
Jeffery Neumann  
Courtney Reinhard  
Adonis Hoffman