



February 18, 2014

BY ELECTRONIC FILING

Marlene H. Dortch, Secretary
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, DC 20554

Re: *Notice of Ex Parte Communication, CG Docket No. 05-231*

Dear Ms. Dortch:

On February 14, 2014, Stacy Fuller of DIRECTV spoke by telephone with Maria Kirby, Legal Advisor to Chairman Wheeler, about the above referenced proceeding. She discussed the proper apportionment of liability for issues relating to the quality of closed captioning, and the process for investigating and determining such liability. In particular, she noted that where a problem with captioning quality arises on the programmer's end, a regime that places liability solely on distributors may be able to recover a monetary fine but will not address and rectify the underlying failure of captioning. If the goal is to ensure high quality closed captioning, it is far better and more efficient to impose liability directly on the party responsible for a problem rather than needlessly insert an intermediary.

Respectfully submitted,

/s/

William M. Wiltshire
Counsel for DIRECTV

cc: Maria Kirby
Adonis Hoffman
Courtney Reinhard
Clint Odom
Jeffrey Neumann
Karen Peltz Strauss
Eliot Greenwald