

February 18, 2014

VIA ELECTRONIC FILING

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

Re: *Closed Captioning of Video Programming, CG Docket 05-231.*

Dear Ms. Dortch:

On February 14, 2014, Jordan Goldstein of Comcast Corporation and Margaret Tobey of NBCUniversal spoke by phone with Kris Monteith and Karen Peltz Strauss of the Consumer and Governmental Affairs Bureau regarding the above-captioned proceeding on closed captioning. On February 18, 2014, we met with Clint Odom, Policy Director for Commissioner Rosenworcel; the undersigned spoke by phone with Jeffrey Neumann, Acting Legal Advisor to Commissioner Pai; and Margaret Tobey spoke by phone with Maria Kirby, Legal Advisor to Chairman Wheeler.

We discussed the NAB/NCTA proposed best practices/safe harbor approach and the burden-shifting compliance proposal that Comcast NBCUniversal previously filed in this docket, including the point that it would not be effective or fair to put the burden on video programming distributors for caption quality issues that are determined to be outside their control.¹ We also urged the Commission to refrain from adopting overly prescriptive requirements in its pass-through rules. We discussed that Comcast is working towards an automated monitoring process for ensuring that caption streams are being passed through, and that any new rules should provide flexibility to accommodate this and other monitoring methods. Finally, we discussed the timing of the effective date of any new rules, including the importance of finalizing the compliance process prior to the effective date of the substantive caption quality rules.

¹ See Letter from Jordan Goldstein, Comcast Corporation, to Marlene H. Dortch, Secretary, FCC, CG Dkt. No. 05-231 (Jan. 28, 2014).

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Please direct any questions regarding this matter to the undersigned.

Respectfully Submitted,

/s/ Jordan Goldstein

Jordan Goldstein
Executive Director, Regulatory Affairs
Comcast Corporation

cc: Maria Kirby
Clint Odom
Jeffrey Neumann
Kris Monteith
Karen Peltz Strauss