

**ALERT**

# FCC Seeks Comment on Petition Filed Pertaining To Live Closed Captioning Quality Metrics and Automatic Speech Recognition

August 27, 2019

In August 2019, the Federal Communications Commission's (FCC Or Commission) Consumer and Governmental Affairs Bureau issued a Public Notice seeking comment on a Petition for declaratory ruling filed by a coalition of consumer and academic organizations, including Telecommunications for the Deaf and Hard of Hearing, Inc., and the National Association of the Deaf (Consumer Groups). The Petition asks the Commission to (1) launch an inquiry into the current state of closed captioning techniques for live television programming, including caption quality; (2) launch a follow-on proceeding to develop rules requiring live TV programming to be captioned consistent with technology-neutral metrics; and (3) issue a declaratory ruling or expedited rule change on the use of automatic speech recognition (ASR) technologies for captioning of live television programs.

The Consumer Groups assert that many consumers have continued to experience poor-quality captions on live programming, and that "it is time for a change." They suggest that a "best practices approach tailored to traditional methods of human and ENT captioning is not a workable approach," and propose that the Commission should adopt new means for objectively assessing how captioning methodologies compare — specifically in terms of the varying dimensions of caption quality, including accuracy, synchronicity, completeness, and placement. Further, they ask the Commission to address near-term issues with respect to ASR by issuing guidance and policy on the application of existing best practices to ASR.

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## Practice Areas

Media  
Telecom, Media & Technology

Comments and reply comments on the Petition are due by September 13 and 30, 2019, respectively. For more information please contact one of the attorneys listed on this alert.