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## Via E-Mail

October 5, 2018

Sherita Kennedy (sherita.kennedy@fcc.gov) Disability Rights Office Consumer & Governmental Affairs Bureau, FCC 445 12<sup>th</sup> Street, SW Washington, DC 20554

Re:

**Informal Captioning Complaint** 

(KTVI(TV), St Louis, MO – Complaint Ticket No. 2795136)

Dear Ms. Kennedy:

This letter is written on behalf of KTVI License, LLC, licensee of KTVI(TV), St. Louis, MO (TV), regarding the informal complaint filed by Ms. Mertens on September 24, 2018, claiming inaccuracy in the captioning provided on KTVI(TV) during its live news broadcasts.

KTVI broadcasts over 67 hours of live local news coverage per week, offering a unique and necessary voice to its viewers. As a FOX affiliate located in one of the top 25 television markets (as determined by Nielsen), KTVI is required to provide real-time captions for its live programming. KTVI provides live captioning as part of its news, and uses the ENCO's Encaption 4 hardware/software system which relies on a voice recognition search engine system to automate closed captioning in near real time. While KTVI makes efforts to provide captioning that meets the FCC's quality standards, because of the immediacy of the live captioning, unavoidable errors occur. KTVI submits these errors as noted by Ms. Mertens are de minimis.

KTVI shared the complaint with Enco in efforts to help Enco make continued improvements to its captioning system. Enco also informed KTVI it is working on adding functionality to the captioning to better differentiate and identify a particular speaker when more than one person is present on camera.

It should also be noted, however, that KTVI has experienced a marked reduction in typographical errors and latency with the ENCO system and believes it will continue to improve moving forward.

The Station is sensitive to viewer concerns and appreciates the input Ms. Mertens in particular has provided. If there are any additional questions, please contact the undersigned.

Sincerely yours

Jason S. Roberts

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