

Jason S. Roberts
Senior Counsel
312/222-3894
jroberts@tribunemedia.com



Tribune Media Company
300 E. Wacker Drive, Ste.
1700
Chicago, Illinois 60601
General: (312) 222-4565
Fax: (312) 222-4206
www.tribunemedia.com

Via E-Mail to ardolan91@yahoo.com

May 30, 2018

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

Re: Informal Captioning Complaint
(KTVI(TV), St. Louis, MO – Complaint Ticket No. 2447588)

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. Dolan claiming inaccuracy and delay 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. 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.

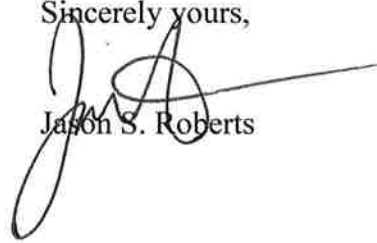
KTVI uses a third party captioning service that employs voice recognition software, a captioning technique common in the industry. The captioner dials into both the KTVI audio feed and KTVI captioning encoder. Using voice recognition software and caption generating machines, the captioner listens and repeats the KTVI audio, which is processed and fed into the encoder for the on-screen captioning.

KTVI has notified the captioning center of the accuracy and latency concerns so that the center may explore ways in which it can improve. KTVI will be sending as much advance material as possible to be used in the live newscasts to give the captioner a better understanding of the material that he or she is captioning, and avoiding the use of contractions and grammatical shortcuts. KTVI will continue to educate its master control operators to become better aware of the presence and accuracy of captions – beyond the required hourly log monitoring notations. Upon noticing missing or garbled captions, the operators have been instructed to call the

captioning service immediately and if necessary, studio maintenance, to determine the cause of the error, and to work towards correcting the issue as quickly as possible.

Even with these initial changes, KTVI is exploring different captioning alternatives in an effort to find ways to improve the service for its viewers. The Station is sensitive to viewer concerns and appreciates the input Ms. Dolan in particular has provided. If there are any additional questions, please contact the undersigned.

Sincerely yours,

A handwritten signature in black ink, appearing to read 'J. Roberts', with a long horizontal line extending to the right.

Jason S. Roberts

cc: DROcarriersupport@fcc.gov
Sarah.Souza@tvstl.com
Jay.Gill@tvstl.com