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September 13, 2018

Ms. Sherita Kennedy
Federal Communications Commission
Disability Rights Office
445 12th Street S.W.
Washington, D.C. 20554

**Re: Notice of Informal Complaint – Kim Mihan
Ticket No. 2702861**

Dear Ms. Kennedy:

At the direction of television broadcast station KRCR in Redding, California, Facility ID 8291 (the "Station"), this letter responds to the above-referenced Notice of Informal Complaint (the "Notice"), issued on August 15, 2018, relating to closed captioning.

Immediately upon receipt of the Notice, the Station's personnel began to investigate. The Station's chief engineer confirmed that its closed captioning equipment was working properly, and there were no exceptions reported. The Station's news director contacted its third party closed captioning service, and reviewed video of the date and time at issue, as well as other newscasts and conferences broadcast during the Carr Fire.

On August 11, 2018, the Station did closed caption during the firefighter's memorial. I have attached a video clip for your reference.

On August 13, 2018, the closed captioning was ordered for the 6:30 a.m. to 7:00 a.m. newscast, which included an interview with Secretary Zinke. The Station's third party closed captioning service connected with the Station's closed captioning encoder, however, for an unknown reason, the closed captions were not transmitted after about 40 seconds into the newscast. The Station's engineer has been unable to locate a technological reason for this apparent failure. The Station's closed captioning service billed the Station for the half-hour of closed captioning services. It should be noted that the Station broadcast another live news conference later that same day with Secretary Zinke, Secretary Perdue, and Rep. LaMalfa, which was closed captioned, a copy of such video is attached.

The Station confirmed that anytime the Station broadcast and streamed the same content online, it was closed captioned. The Station vehemently denies the complainant's statement, "Throughout the CarrFire incidents they have not added CC on tv or online! When there was an ASL interpreter they would not make sure it was visible." I have attached video clips which illustrate the

Station's commitment to serving its viewers. The Station intentionally kept its shots wide to see the ASL interpreter, however, there was one conference in which the photographer zoomed in too much and cut out the ASL interpreter, which was corrected shortly thereafter.

The Station did at times distribute news online directly from a cell phone via Facebook Live, which was not broadcast by the Station, and was not closed captioned, consistent with the Rule 47 CFR 79.4.

With regard to the weather, the Station became aware that its third-party closed captioning service was unable to hear the audio from the weathercaster, which resulted in a lack of closed captioning of weather. This issue has been corrected.

The Station has and continues to comply with the Commission's closed captioning rules. The Station, and its parent company, is currently investing in multiple system improvements, including closed captioning.

Please contact me if you have any questions or need any further information.

Sincerely yours,

A handwritten signature in blue ink that reads "Susan E. Domozych". The signature is fluid and cursive, with a long horizontal stroke at the end.

Susan E. Domozych
Senior Paralegal

cc: KRCR
Kim Mihan