



Henry H. Wendel
+1 202 776 2943
hwendel@cooley.com

May 18, 2018

VIA HAND DELIVERY AND EMAIL

Ms. Judy Miller
Disability Rights Office
Consumer & Governmental Affairs Bureau
Federal Communications Commission
445 Twelfth Street S.W.
Washington, D.C. 20554

Re: KIRO-TV, Seattle, Washington
Facility Identification Number 66781
FCC Complaint Ticket No. 2379027 ()
Response to Notice of Informal Complaint

Dear Ms. Miller:

On behalf of KIRO-TV, Inc. (“Cox Media Group”), licensee of KIRO-TV, Seattle, Washington, we hereby submit Cox Media Group’s response to the April 18, 2018 letter from the Commission’s Consumer & Governmental Affairs Bureau (the “Letter”).¹ The Letter forwarded a complaint from Ms. _____, which states that certain programming on KIRO-TV did not include “audio description for the blind.” Specifically, Ms. _____ states that beginning on or about February 24, 2018, programming provided by the CBS Television Network did not include video descriptions. Cox Media Group takes seriously all viewer comments and concerns and makes every effort to review and resolve complaints promptly. Cox Media Group conducted a thorough investigation into Ms. _____’s observations. This response, a copy of which is provided directly to Ms. _____, reflects the results of that investigation.

The Commission’s video description rules require broadcast television licensees that are affiliated with one of the top four broadcast networks and located in one of the top 60 designated market areas to air at least 50 hours of video described programming per calendar quarter.²

¹ *Official Notice of Informal Complaint*, Disability Rights Office, Consumer & Governmental Affairs Bureau, Federal Communications Commission, to KIRO-TV, Inc., FCC Complaint Ticket No. 2379027 (

² 47 C.F.R. § 79.3(b)(1).



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Additionally, network affiliated broadcast television stations also must pass through any video descriptions that are provided by the network.³ While Cox Media Group included at least 50 hours of video described programming during the first quarter of 2018, it did identify an issue that prevented certain video descriptions from being conveyed. Cox has since remedied that issue, and KIRO-TV's viewers are now able to hear all video descriptions provided by the network.

Cox Media Group recently upgraded the entire master control facility for KIRO-TV. In connection with that upgrade, Cox Media Group replaced the equipment used to pass through the video descriptions KIRO-TV receives with its CBS affiliated network programming. In the course of upgrading its master control facility, Cox Media Group proactively replaced the video description equipment, because the legacy equipment was no longer serviceable.

Before Cox Media Group activated the new video description equipment, KIRO-TV's engineering personnel tested the equipment to confirm that it was working properly. After conducting the requisite tests, Cox Media Group personnel attempted to incorporate it into its daily operations. Unfortunately, the equipment did not perform as expected with the live video feed of CBS programming. Cox Media Group subsequently contacted the manufacturer to receive the necessary hardware and software to remedy the issue. The manufacturer provided several different hardware and software remedies, but it was not until April 19, 2018 that the manufacturer provided the final software upgrade that enabled the video description equipment to function as expected. After testing the equipment on April 19, Cox Media Group contacted Ms. [redacted] on April 20 to inform her that the video description issue she had experienced was resolved. Ms. [redacted] confirmed that she was able to see video descriptions during the programming that aired on KIRO-TV on April 24.

Cox Media Group has taken additional steps to ensure that its staff readily identifies video description issues for a faster resolution. Master control personnel will be notified of which programming includes video descriptions and will be required to confirm video descriptions are being conveyed to KIRO-TV's viewers. In addition, Cox Media Group has installed backup video description equipment for redundancy should issues arise with the station's primary video description equipment. Thus, if equipment issues arise with the primary video description equipment, station personnel can quickly switch to the backup equipment to pass through video descriptions.

Cox Media Group takes great pride in serving the Seattle community, and the station long has been committed to providing high quality, accessible programming to all of its viewers. As part of its ongoing dialog with the community, Cox Media Group provides several approaches by

³ 47 C.F.R. § 79.3(b)(3).



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which Ms. [redacted] and other viewers can share their questions about KIRO-TV's programming. A viewer can report any closed captioning or video description problems by sending a message to the station's closed captioning hotline at captioning.complaint@kiroTV.com. In addition, viewers can contact the hotline by telephone. A station representative will respond within one business day.

Please contact us directly if you have any questions about the attached response.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read "H. Wendel".

Henry H. Wendel
Counsel to KIRO-TV, Inc.

cc (via e-mail): Mr. Greg Bilte

cc (via USPS and e-mail): Ms.