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November 4, 2014

BY HAND DELIVERY

Susan L. Kimmel, Deputy Chief
Disability Rights Office
Consumer & Governmental Affairs Bureau
Federal Communications Commission
445 12th St., S.W.
Washington, D.C. 20554

Re: **Informal Complaint No. 14-C00614134-1 (Hale) (KSTR-TV)**

Dear Ms. Kimmel:

UniMas Dallas LLC, licensee of KSTR-DT, Irving, Texas (the "Station") hereby responds to the Informal Complaint filed by Mr. Rod Hale concerning the closed captioning provided by the Station.

The Informal Complaint states that the Station (along with several other Dallas-area television stations) does not have captioning in the English language. It further alleges that the failure of a station broadcasting in a language other than English to provide English-language captioning is a violation of the Constitution.

The Station broadcasts its programming in Spanish, and it provides closed captioning in the Spanish language. The Station's practice of providing closed captioning in the language in which the Station broadcasts complies with 47 C.F.R. § 79.1, which provides as follows:

- "Closed captioning shall convey the aural content of video programming in the original language (*i.e.* English or Spanish) to individuals who are deaf and hard of hearing to the same extent that the audio track conveys such content to individuals who are able to hear."¹

¹ 47 C.F.R. § 79.1(j)(2).

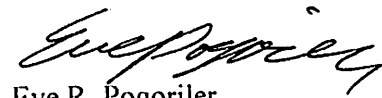
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- “Captioning shall match the spoken words... *in their original language* (English or Spanish)...”²
- “Open captioning or subtitles in the language of the target audience may be used in lieu of closed captioning.”³

Accordingly, the Station’s practice of providing closed captioning in Spanish complies with the Commission’s rules, and it is consistent with the purpose of those rules, which is to ensure that deaf or hard of hearing members of the programming’s target audience are able to understand the same words that are spoken aloud.

Respectfully submitted,



Eve R. Pogoriler
Counsel for UniMas Dallas
LLC

cc: Susan L. Kimmel (by e-mail: Susan.Kimmel@fcc.gov)
DROinquiries&complaints@fcc.gov
Rod Hale (by first class U.S. mail to: 1375 County Road 313, Glen Rose, TX 76043)

² 47 C.F.R. § 79.1(j)(2)(i) (emphasis supplied).

³ 47 C.F.R. § 79.1(e)(2).