

David M. Giles VP, Deputy General Counsel, Chief Ethics Officer

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August 3, 2015

VIA EMAIL ONLY

Ms. Sherita Kennedy
Telecommunications Accessibility Specialist
Disability Rights Office
Consumer & Governmental Affairs Bureau
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554
Sherita.Kennedy@fcc.gov

Re: Notice of Informal Complaint (NOIC) from Sean Landry FCC DRO Ticket No. 427438

Dear Ms. Kennedy:

This office serves as corporate counsel to Scripps Media, Inc. ("Scripps"), the licensee of Station WMAR-TV, Baltimore, Maryland. This letter responds to the above-captioned Notice of Informal Complaint ("NOIC") that you sent to Station WMAR-TV's Paul Wilkinson via email on July 29, 2015. This NOIC involves the station's compliance with the captioning requirements set out in Section 79.1 of the Commission's rules, 47 C.F.R. § 79.1.

Specifically, the NOIC directs the station to respond to the matters raised in a complaint from Mr. Sean Landry. Station WMAR-TV operates on virtual channels 2.2 and 2.3, and Mr. Landry's NOIC alleges that the Station WMAR-TV "is NOT captioning any of its TV shows at all." In his NOIC, Mr. Landry specifies that these issues arose while watching "Major Payne" on Station WMAR-TV's digital subchannel 2.3 and "Renaissance Man" on Station WMAR-TV's digital subchannel 2.2.

Contrary to Mr. Landry's claim, Station WMAR-TV's channels, including digital subchannels 2.2 and 2.3, operate in compliance with Section 79.1. Station WMAR-TV broadcasts the LAFF network on digital subchannel 2.2 and the Bounce network on digital subchannel 2.3. Both Bounce and LAFF are new networks. Bounce launched on September 26, 2011. LAFF launched on April 15, 2015. As such, both Bounce and LAFF are exempt from closed captioning under Section 79.1(d)(9) of the Commission's Rules, 47 C.F.R. § 79.1(d)(9). The exemption for new networks allows networks in operation for four (4) years or less not to provide closed captioning. See, Section 79.1(d)(9). Upon receipt of Mr. Landry's complaint, Station WMAR-TV contacted the owner of Bounce and LAFF. Station WMAR-TV was assured that programming on both networks will be closed-captioned before the expiration of the exemption period.

Scripps and Station WMAR-TV take very seriously their responsibility to serve the entire community. Station WMAR-TV will continue its efforts to ensure that its captioning service complies with the Commission's requirements.

In accordance with the directions in the NOIC, this response is being delivered to you via email only, and a copy is being emailed today to Mr. Landry at the email address listed on the complaint and set out below.

Please contact the undersigned if you require any additional information.

Sincerely,

David M. Giles

DMG/jk

cc: Mr. Sean Landry (via email slandry164@gmail.com)



Bounce Media, LLC 3500 Piedmont Road, Suite 400 Atlanta, GA 30305 770-672-6500 March 16, 2015

RE: Certification of Compliance with FCC's New Closed Captioning Quality Requirements Set Forth in 47 C.F.R. § 79.1, et seq.

This is to certify that, as of March 16, 2015, the video programming network known as Bounce TV is in compliance with the Federal Communication Commission's new Closed Captioning Quality Requirements set forth in 47 C.F.R. § 79.1, et seq., by virtue of Bounce TV's being subject to the exemption from the closed captioning requirements applicable to a new video programming network during "the first four years after it begins operations." 47 C.F.R. § 79.1(d)(9). Bounce TV began operations on September 26, 2011, and is therefore exempt pursuant to 47 C.F.R. § 79.1(d)(9) from the FCC's closed captioning requirements until September 26, 2015.

I hereby certify that the foregoing is true and correct. Executed this 16th day of March, 2015.

Jonathan Katz, COO



LAFF Media, LLC 3500 Piedmont Road, Suite 400 Atlanta, GA 30305 770-672-6500 March 16, 2015

RE: Certification of Compliance with the FCC's New Closed Captioning Quality Requirements Set Forth in 47 C.F.R. § 79.1, et seq.

This is to certify that, as of April 15, 2015, the video programming network known as LAFF is in compliance with the Federal Communication Commission's new Closed Captioning Quality Requirements set forth in 47 C.F.R. § 79.1, et seq., by virtue of LAFF's being subject to the exemption from the closed captioning requirements applicable to a new video programming network during "the first four years after it begins operations." 47 C.F.R. § 79.1(d)(9). LAFF began operations on April 15, 2015, and is therefore exempt pursuant to 47 C.F.R. § 79.1(d)(9) from the FCC's closed captioning requirements until April 15, 2019.

I certify that the foregoing is true and correct. Executed this 15th day of April, 2015.

Jonathan Katz, President and CEO