

April 4, 2019

Via Electronic Mail

Sherita Kennedy
Disability Rights Office
Federal Communications Commission
445 Twelfth Street, SW
Washington, DC 20554
Sherita.Kennedy@fcc.gov

Re: FCC Notices of Informal Complaint Ticket Nos. 2594981, 2604454 and 2604503

Dear Ms. Kennedy:

Raycom Media Licensee, LLC, Honolulu, Hawaii (licensee of KHNL(TV) and KGMB(TV), collectively the “Stations”) hereby responds to your e-mail of March 13, 2019 (the “E-mail”) pertaining to the Further Notices of Informal Complaints (the “FNOICs”) dated November 9, 2018 and the Official Notices of Informal Complaint dated June 26, 2018 (Ticket No. 2594981) and July 5, 2018 (Ticket Nos. 2604503 and 2604454). The E-mail requests further information regarding the Stations’ December 6, 2018 response to the FNOICs (the “Response”). Specifically, the E-mail states:

- “please advise whether, and on what date, the stations transitioned back to ENT captioning (away from “live” captioning), which you indicated would occur (i.e., at some point around or after the “end of the year);
- [the Response] indicates that “all news managers have stepped up their monitoring of newscast captioning[”]—please provide information on the results of that monitoring for news programming after the station(s) returned to ENT as indicated, specifically concerning instances of non-compliance, or potential non-compliance with the Commission’s ENT captioning rules (47 C.F.R. § 79.1) or emergency information rules (47 C.F.R. § 79.2) since such monitoring began; and
- in the FNOIC, the stations were asked whether ENT refinements or other corrective measures have been applied to all stations within the shared services agreement under the “Hawaii News Now” brand. [The Response] did not address this question. Please address it and, at minimum, indicate whether the “stepped up...monitoring” by “all news managers” has been

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applied to all stations within the HNN shared services arrangements, and describe the results of any such monitoring after re-implementation of ENT for news captioning...”

The Stations’ newscasts continue to be live captioned as of the date of this letter and we plan to continue doing so indefinitely. Station news leadership continues to emphasize the importance of supplemental crawls and textual information, as well. Given that the Stations have not returned to ENT as was anticipated in the Response, there are no instances of non-compliance or potential non-compliance to report on their behalf or for KFVE(TV).

As was indicated in the Response, “[the] Stations’ newscasts, *including those provided for broadcast on KFVE(TV) under the terms of a shared services agreement* [emphasis added], continue to be entirely live captioned as of the date of [the Response.]” To further clarify, newscasts provided by Station personnel for broadcast on KFVE(TV) received the same attention, monitoring and corrective measures as the newscasts that were to be broadcast on the Stations. However, it bears pointing out that the FCC license for KFVE(TV) was assigned to Nexstar Broadcasting, Inc. as of Dec. 17, 2018 and now operates under the FCC-assigned call letters KHII-TV.

We again thank Ms. Ewan for bringing these matters to our attention and affording the Stations the opportunity to improve the manner in which we serve the hearing-impaired community. Please do not hesitate to contact me with any further questions or concerns. I can be reached by phone at (808)847-9301, or by email at rblangiardi@hawaiinewsnow.com.

Sincerely,

A handwritten signature in black ink that reads "Rick Blangiardi".

Rick Blangiardi

cc: Ms. Darlene Ewan (by e-mail only)
canthecant@gmail.com