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Federal Communications Commission
Disability Rights Office
45 L Street NE
Washington, DC 20554

Dear Disability Rights Office:

As a member of the National Court Reporters Association (NCRA), which represents stenographic court reporters and captioners, I am writing to advise the Federal Communications Commission's Disability Rights Office (FCC DRO) that a myriad of local television stations in the top 25 Designated Market Areas are not adhering to the FCC's caption quality best practices. According to the best practices, the FCC requires captions to be accurate, synchronous, complete, and properly placed. Unfortunately, local television stations have disregarded the FCC's caption quality best practices and are actively choosing not to provide equal access to captioning. Moreover, television stations are using Automatic Speech Recognition (ASR) instead of a human captioner. When ASR is used for captioning, it does not include the basic requirements for captioning such as punctuation, speaker identification, sound effects, and proper names. Often, ASR makes the captions unreadable and changes the context of the news being delivered, which is a disservice to caption viewers.

The FCC's complaint process is cumbersome, and consumer complaints to television stations are often ignored. It is routine that the television stations' responses to these consumer complaints are unprofessional and even sometimes disrespectful to the complainant.

In sum, I would like to know what the FCC is doing to ensure that television stations comply with the FCC's caption quality best practices and to guarantee that all viewers have equal access to their communication needs.

Very Respectfully,

Following is a list of stations, which I believe may be in violation of the FCC's caption quality best practices:

<i>Station Name</i>	<i>City</i>	<i>DMA Rank</i>	<i>Affiliate</i>	<i>Station Group Owner</i>
WNYW	New York	1	FOX	Fox TV Stations Inc.
KTTV	Los Angeles	2	FOX	Fox TV Stations Inc.
WFLD	Chicago	3	FOX	Fox TV Stations Inc.
WTFX	Philadelphia	4	FOX	Fox TV Stations Inc.
KDFW	Dallas-Fort Worth	5	FOX	Fox TV Stations Inc.
WFAA	Dallas-Fort Worth	5	ABC	Tegna Media (moving to ASR March 2021)
KTVU	San Francisco-Oakland-San Jose	6	FOX	Fox TV Stations Inc.
WTTG	Washington, D.C.	7	FOX	Fox TV Stations Inc.
WUSA	Washington, D.C.	7	CBS	Tegna Media (moving to ASR March 2021)
KPRC	Houston	8	NBC	Graham Media Group
KHOU	Houston	8	CBS	Tegna Media (moving to ASR March 2021)
WFXT	Boston	9	FOX	Cox Media Group
WSB	Atlanta	10	ABC	Cox Media Group
WAGA	Atlanta	10	FOX	Fox TV Stations Inc.
WXIA	Atlanta	10	NBC	Tegna Media (moving to ASR March 2021)
KSAZ	Phoenix	11	FOX	Fox TV Stations Inc.
KPNX	Phoenix	11	NBC	Tegna Media
WTVT	Tampa-St. Petersburg	12	FOX	Fox TV Stations Inc.
WFLA	Tampa-St. Petersburg	12	NBC	Nexstar Media
WTSP	Tampa-St. Petersburg	12	CBS	Tegna Media
KIRO	Seattle-Tacoma	13	CBS	Cox Media Group
KING	Seattle-Tacoma	13	NBC	Tegna Media
WKBD/WWJ	Detroit	14	CBS	CBS Corporation
WJBK	Detroit	14	FOX	Fox TV Stations Inc.
KMSP	Minneapolis-St. Paul	15	FOX	Fox TV Stations Inc.
KARE	Minneapolis-St. Paul	15	NBC	Tegna Media
KUSA	Denver	17	NBC	Tegna
KDVR	Denver	17	FOX	Tribune
WFTV	Orlando-Daytona Beach-Melbourne	18	ABC	Cox Media Group
WOFL	Orlando-Daytona Beach-Melbourne	18	FOX	Fox TV Stations Inc.
WKMG	Orlando-Daytona Beach-Melbourne	18	CBS	Graham Media Group
WJW	Cleveland-Akron	19	FOX	Local TV, LLC
WOIO	Cleveland-Akron	19	CBS	Raycom Media
WKCY	Cleveland-Akron	19	NBC	Tegna Media
KXTV	Sacramento-Stockton-Modesto	20	ABC	Tegna Media
KTXL	Sacramento-Stockton-Modesto	20	FOX	Tribune
WSOC	Charlotte	21	ABC	Cox Media Group
WJZY	Charlotte	21	FOX	Nexstar
WCNC	Charlotte	21	NBC	Tegna Media
KOIN	Portland, OR	22	CBS	New Vision Television
KGW	Portland, OR	22	NBC	Tegna Media
KTVI	St. Louis	23	FOX	Local TV LLC
KDNL	St. Louis	23	ABC	Sinclair Broadcast Group
KSDK	St. Louis	23	NBC	Tegna Media
WPXI	Pittsburgh	24	NBC	Cox Media Group
WPGH	Pittsburgh	24	FOX	Sinclair
WTTV	Indianapolis	25	CBS	LIN TV