

1/30/09

Explanation of Non-substantial changes to Collection 3060-0874

As explained below, the changes to FCC Form 2000C for which approval is sought are non-substantial changes.

1. Modification of Question 1:

Deletion of the parenthetical “absence, quality or pass through High Definition (HD) programs.”

This parenthetical is confusing and limiting in its scope – suggesting that only complaints regarding the stated issues may be filed. This should not have been included in the current version of the form.

2. Modification of Question 5(a):

Current version: “Television station call sign (e.g., “WZUE-TV”):
_____”

Proposed version: “Television station call sign and network name (if applicable), or channel name (e.g., “WZUF, CBC,” “WZUE-TV” “Sportingchannel West”):
_____”

The question was modified in order to assist consumers since they often do not know the call sign of the channel they are viewing, but do know what network or channel they are watching. This should have been included in the current version of the form.

3. Modification of Question 5(b):

Current version: “Station channel (e.g., “13”): _____”
Proposed version: “Channel (e.g., “13”): _____”

“Station” was deleted because it is unnecessary and confusing. Proposed version should have been included in the current version of the form.

4. Modification of Question 5(c):

Current version: “Station location: City _____ State:
_____”

Proposed version: “Station or subscription TV provider system location:
City _____ County _____ State: _____”

Information regarding the location of the subscription TV provider system is important for consumers who subscribe to television service, rather than receive their television programming over-the-air. Further, knowing the name of the county will assist the FCC in serving the complaint on the correct entity. This should have been included in the current version of the form.

5. Modification of Question 6(a):

Current version: "Television station call sign (e.g., "WZUE-TV"):
_____"

Proposed version: "Television station call sign and network name (if applicable),
or channel name (e.g., "WZUF, CBC," "WZUE-TV" "Sportingchannel West"):
_____"

The question was modified in order to assist consumers since they often do not know the call sign of the channel they are viewing, but do know what network or channel they are watching. This change is consistent with the change proposed for question 5(a). This should have been included in the current version of the form.

6. Modification of Question 6(b):

Current version: "Station frequency (e.g., "1020" or "88.5"): _____ or channel
(e.g., "13"): _____."

Proposed version: "Channel (e.g., "13"): _____"

The question regarding station frequency is deleted because it pertains to RADIO frequencies and was erroneously placed in a question regarding TELEVISION closed captioning when the form was first created.

7. Modification of Question 6(c):

Current version: "Station location: City _____ State:
_____"

Proposed version: "Station or subscription TV provider system location:
City _____ County _____ State: _____"

Information regarding the location of the subscription TV provider system is important for consumers who subscribe to television service, rather than receive their television programming over-the-air. Further, knowing the county will assist the FCC in serving the complaint on the correct entity. This change is consistent with the change proposed for question 5(c). This should have been included in the current version of the form.

8. Renumbering of Question 6(d) to new 6(f):

This results from the addition of new questions 6(d) and (e), described below.

9. Addition of new Question 6(d):

"If you pay to receive television programming, type of subscription service (e.g. cable, satellite): _____"

The obligation to close caption resides with the video programming distributor (VPD). The VPD is oftentimes a cable or satellite company, as opposed to a broadcaster. As such, it is important that the complainant identify the VPD. This information is needed in order for the Commission to properly direct a closed

captioning complaint. This question should have been in the current version of the form, but was omitted accidentally.

10. Addition of new Question 6(e):

“If you pay to receive television programming, name of company to whom you subscribe: _____”

As explained above, the VPD is responsible for ensuring programming is closed captioned. The new question 6(e) elicits information about the VPD, and this information is needed in order for the Commission to properly direct a closed captioning complaint. This question should have been in the current version of the form, but was omitted accidentally.

11. Deletion of the following note from questions 1 and 6:

“Note: If your complaint is about closed captioning only, you must first contact the station or video programming distributor. For additional information, see <http://www.fcc.gov/cgb/consumerfacts/closedcaption.html>.”

Closed captioning complaints can be filed directly with the FCC, without the need to be filed with the VPD first. The proposed requirement and the burden associated with this requirement received approval from OMB at the NPRM stage in 2005, in collection 3060-0761. The final rulemaking for the requirement and burden was adopted by the Commission on November 3, 2008 (FCC 08-255).