

## Justification 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:

Add a check box with the associated text “Video Description (audio narrated descriptions of a TV program’s key visual elements)”

Because the new rules regarding Video Description go into effect on July 1, 2012,<sup>1</sup> there needs to be a place on the form to indicate that the consumer is filing a complaint about this issue. Currently, there is no way to indicate this subject matter.

The parenthetical is added to clarify what is meant by the term Video Description which is frequently referred to in other settings as Audio Description.

### 2. Modification of Question 6:

Current version: “If your complaint is about closed captioning, provide the following:

Proposed version: “If your complaint is about video description **or** closed captioning on television, provide the following:”

Both closed captioning (CC) and video description require collecting the same types of information from the consumer. Thus it is possible to use the wording of the current version of the 2000C form for both. All that is required is to add the term “video description” to the heading.

The modifying phrase “on television” was added in anticipation of the new rules for CC on the internet which become effective on September 30, 2012. It will be desirable at that time (when further modifications to the 2000C form are anticipated) to distinguish CC on television from CC on programming viewed over the internet. Because video description is only available on television, it is not inaccurate to have this modifying phrase apply to both video description and CC in this sentence.

As explained below, the changes to FCC Forms 2000A – F for which approval is sought are non-substantial changes.

### 3. Modification of Question 7:

Current version: After the text box there is the statement:  
“Character Count: 0                      1,000 Characters max.”

Proposed version: Adds the option to attach files by providing a dropdown menu. (See screen shots for each method of attachment: electronically, by fax, by postal mail.)

This revision of the form is requested to expand the amount of text consumers can submit along with their complaint. Some consumers find the 1,000 character limit too confining

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<sup>1</sup> See, *Video Description: Implementation of the Twenty-First Century Communications and Video Accessibility Act of 2010*, MB Docket No. 11-43, (rel. Aug. 25, 2011)(*Report And Order*).

to fully explain the details. It is advantageous for both the FCC and the consumer to enable the entire record to be filed online as an attachment or by other means (fax and postal mail) that could easily be associated with the computer-generated CCMS identification number.