

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:

New rules require closed captioning of video programming delivered using Internet protocol (IP) beginning September 30, 2012.¹ The current Form 2000C has a check box for “Closed Captioning” complaints, but does not distinguish between televised video programming and IP-delivered video programming.

Therefore, change the current check box for “Closed Captioning” to “Closed Captioning on television (from a television station or subscription TV provider, for example, cable, fiber optic or satellite)” and add a new check box for “Closed Captioning of television programs streamed or downloaded from the Internet (for example, to your computer, tablet, smartphone, television, video game console, or other Internet-enabled device).”

Because the new rules regarding Closed Captioning of Video Programming Delivered Using Internet Protocol (IP Closed Captioning) go into effect on September 30, 2012,² 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.

2. New Question 7:

Currently, Question 6 asks for information related to closed captioning of televised video programming (e.g., television station call sign, channel, etc.), but does not ask for the kinds of information needed to process complaints about closed captioning of IP-delivered video programming.

Therefore, insert a new Question 7 to obtain the information needed:

If your complaint is about closed captioning of television programs streamed or downloaded from the Internet, provide the following information:

- a. Information about the program viewed (for example, "Orange Blossoms, Season 3, Episode 6")
- _____
- b. Name, address, website, or e-mail address of the program distributor, provider, and/or owner (for example, "WZUF-CBC.com," "WZUE-TV.com," "SportingchannelWest.com," "TV&MoviesOnline"):
- _____
- c. Information about the device or software used to view the program (for example., manufacturer, model number, name of video player software or application):

¹ See *Closed Captioning of Internet Protocol-Delivered Video Programming: Implementation of the Twenty-First Century Communications and Video Accessibility Act of 2010*, MB Docket No. 11-154, Report and Order, FCC 12-9, 27 FCC Rcd 787 (rel. January 13, 2012). See also 47 C.F.R. § 79.4.

² 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).

d. _____ Date (mm/dd/yyyy) _____ and time _____ AM. PM the program was viewed.

The information requested in new Question 7 is required by the new rules, 47 C.F.R. §§ 79.4(e)(1) and (2). As such, the information collected by Question 7 had previously been approved when reviewed by OMB Control Number 3060-1162. Consistent with the modifications to the Supporting Statement of that item, some of the burdens from 3060-1162 have been transferred to the information collection associated with OMB Control Number 3060-0874. Among the various forms contained within 3060-0874, FCC Form 2000C is the form used to collect this information and Question 7 particularly addresses the issues of IP Closed Captioning.

The examples provided in new Question 7.b. are similar to the examples provided in current Question 6.a. (e.g., “WZUF, CBC,” “WZUE-TV,” “Sportingchannel West”), providing continuity for consumers.

3. Rerumber Current Question 7 as Question 8:

By inserting the new Question 7, the current Question 7 is renumbered as Question 8.

4. Wherever “*i.e.*” or “*e.g.*” appeared in the original Form 2000C, it is replaced with “for example” because we believe that this terminology is more easily understood by the average consumer. We view this word change as non-substantial because it translates a Latin phrase into English and, in this context, has the same meaning.