

SOCIETY OF BROADCAST ENGINEERS, INC.

The Association for Broadcast and Multimedia Technology Professionals

9102 North Meridian Street, Suite 150 • Indianapolis, IN 46260 Phone: 317-846-9000 • Fax: 317-846-9120 • Website: www.sbe.org

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wpeccna@sbc.org

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James Ragsdale
Society of Broadcast Engineers
jragsdale@sbe.org

Tuesday, May 23, 2023

Ex Parte Presentation

By Electronic Filing

Marlene H. Dortch Secretary Federal Communication Commission 45 L Street NE Washington, DC 20554

RE: Ex Parte Presentation, MB Docket No. 12-107 – Letter of Support

Dear Ms. Dortch,

In accordance with Section 1.1206 of the Commission's rules, the Society of Broadcast Engineers, Inc. ("SBE") respectfully submits this letter for inclusion in the record of the above-referenced proceeding.

SBE wishes to express support for the working group proposed by the National Association of Broadcasters ("NAB") in its Reply Comments filed in regard to the Petition for Extension of Waiver in MB Docket No. 12-107. SBE filed Comments in this proceeding, supporting the Petition, but did not have the opportunity to address the suggestion of a working group because it was first raised in NAB's Reply Comments.

The NAB Reply's recommendation to convene a working group of stakeholders to address this issue would allow all interested parties to come together to seek real-world solutions to the challenge of providing audio description of non-textual images, and ensure that critical emergency information is accurately and effectively conveyed to

¹ Reply Comments of the National Association of Broadcasters, Accessible Emergency Information, and Apparatus Requirements for Emergency Information and Video Description: Implementation of the Twenty-First Century Communications and Video Accessibility Act of 2010, MB Docket 12-107 (May 1, 2023) ("NAB Reply").

² Comments of the Society of Broadcast Engineers, Accessible Emergency Information, and Apparatus Requirements for Emergency Information and Video Description: Implementation of the Twenty-First Century Communications and Video Accessibility Act of 2010, MB Docket 12-107 (April 24, 2023).

all television consumers. Aside from working to establish a viable technical path forward for compliance, such a working group could facilitate discussion as to the most effective ways to describe emergencies for members of the disability community. Consequently, broadcasters would welcome the opportunity to sit down with the FCC and members of the disability community to hear any concerns and collaborate on a path forward on multiple aspects of the rule.

Thank you for the opportunity to be heard on this matter. SBE is glad to provide whatever support it can to aid the FCC in these efforts.

Respectfully,

THE SOCIETY OF BROADCAST ENGINEERS, INC.

Andrea Cummis, CBT, CTO SBE President

Charles (Ched) Keiler, CPBE, 8-VSB, CBNE
Chair, SBE Government Relations Committee

Coe W. Ramsey Patrick Cross Noah L. Hock SBE Regulatory Counsel

BROOKS, PIERCE, MCLENDON, HUMPHREY & LEONARD, L.L.P. Wells Fargo Capitol Center, Suite 1700 Raleigh, NC 27601 Telephone: (919) 839-0300

cc (via email):

Diana Sokolow, Media Bureau, Policy Division (Diana.Sokolow@fcc.gov)

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Proceeding(s): 12-107

Confirmation #: 202305232198104697 Submitted: May 23, 2023 9:16:41 AM

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> Brooks, Pierce, McLendon, Humphrey & Leonard L.L.P. Law Firm(s)

Attorney/Author/Submitter Name(s) Noah L. Hock

> **Primary Contact Email** nhock@brookspierce.com

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Noah Hock

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Sent: Tuesday, May 23, 2023 9:17 AM

To: Noah Hock

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Proceeding(s): 12-107

Filer(s): Society of Broadcast Engineers, Inc.

Attorney/Author(s): Noah L. Hock

Law firm(s): Brooks, Pierce, McLendon, Humphrey & Leonard L.L.P.

Presented to: Media Bureau Date Submitted: 05/23/2023

Primary Contact Email: nhock@brookspierce.com

Documents(s) Attached: SBE - Ex Parte Letter of Support.pdf

Address: Wells Fargo Capitol Center, Suite 1700 Raleigh, NC 27601, Raleigh, NC 27601