



**LNS Captioning – Realtime Captioning  
Statement of FCC Compliance  
January 2015**

LNS Captioning has been providing transcription, captioning, and subtitling services to local and national clients for over 20 years. Like the FCC, we are dedicated to ensuring that all television viewers have full access to media content, and our reputation for excellent captioning quality is proof of that. A brief description of our captioning process and compliance with the FCC's closed captioning rules follows.

LNS Captioning requires its captioners to adhere to the highest standards of accuracy and integrity in their work. As a baseline for hiring, our captioners must hold national certification from the National Court Reporters Association. Earning and holding one of the national certifications tells us this captioner is highly competent in grammar, spelling, and word usage, and has the stenographic skills to write accurately at 225 words per minute and higher. We also conduct regular evaluations of our captioners' caption files which help resolve any commonly seen errors and issues.

LNS also requires its captioners to adhere to the NCRA's "Recommended Style and Format Guidelines for U.S. Programming." The FCC's recently published Best Practices for captioning are actually all covered within NCRA's "Recommended Style and Format Guidelines," and indeed, the NCRA worked with the FCC to develop the new standards, so these requirements are nothing new for our certified captioners. We have been meeting these standards all along, as detailed below:

**Accuracy:** *The FCC stipulates that captions must match the spoken words in the dialogue and convey background noises and other sounds to the fullest extent possible.*

All of our captioners are stenographic captioners, who were trained as court reporters. Our captioners listen to the live television program, write what they hear as they hear it, and use their specialized computer dictionaries to translate what they write into English. That English output is then sent to the caption encoder at the television station or site of the program origination, and the captions are then displayed.

The captioners' goal is to write every word. However, in live TV, people will talk over each other, or talk at speeds over 300 words per minute. The captioners are trained how to create captions that are as accurate and as readable as possible within the realm of a live television broadcast. The expected accuracy rate for our captioners is 98.5%. Over the last several years, we have averaged 98.9% accuracy.

We have a quality control program, which involves our quality control coordinator reading randomly selected unedited caption files provided by the captioners. The coordinator reviews the file for completeness, accuracy in spelling and grammar, and adherence to style requirements. The file is then forwarded to the owner of the company for review. After that review, the captioner receives the file, and is expected to make any corrections necessary to his or her computer, software, and equipment.

We do not check our caption files to the audio of the program. We do not have routine access to the audio from our programs after the fact. And the time involved in checking the captioner's file to the actual audio is cost-prohibitive. The coordinator reviews the actual captions delivered to the station and viewed by the audience.

**Synchronicity:** *The FCC requires that captions must coincide with their corresponding spoken words and sounds to the greatest extent possible and must be displayed on the screen at a speed that can be read by viewers.*

Our captioners are able to adjust the captioning software in order to display the captions as soon as the words are transcribed. We monitor this function of our software to make sure the settings are not set too long, which would introduce a delay to the captions, or too short, which causes the words to pop on and off the screen.

Other delays may be introduced into the broadcast downstream of the captioner's insertion of the captions. If we are able to monitor our captions and see an unacceptable delay not caused by our captioner, we will alert the station of the problem. If we cannot monitor the captions, the station needs to monitor the synchronicity of the captions.

**Completeness:** *The FCC requires that captions must run from the beginning to the end of the program to the fullest extent possible.*

We caption the complete program, from beginning to end, except for commercials. For programs with no commercials, we caption the program until the next program begins. We make sure to clear our captions at the end of the program to not block the captions that are provided in the following program.

**Placement:** *The FCC requires that captions should not block other important visual content on the screen, overlap one another or run off the edge of the video screen.*

LNS places captions on the screen at the direction of the client. The captioner has no control over where graphics are placed within the television signal. That is the decision of the client. Much of our work is done remotely, and we are often unable to view our shows we caption as we caption. We rely on the client to guide us about placement. All leading captioning software packages allow the captioner to place captions anywhere in the TV field. We also follow our clients' direction with regard to the length of the line of captions. The standard is 32 characters per line, but our software allows us to send a shorter line if requested.