



April 26, 2018

Via ECFS

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: Ex Parte Presentation; Petition for Waiver of the American Cable Association, filed Mar. 9, 2018; 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 No. 12-107; Video Description: Implementation of the Twenty-First Century Communications and Video Accessibility Act of 2010, MB Docket No. 11-43.

Dear Ms. Dortch:

On April 24, 2018, Ross J. Lieberman, Senior Vice President of Government Affairs, American Cable Association (“ACA”), Mary C. Lovejoy, Vice President of Regulatory Affairs, ACA, and the undersigned, representing ACA, met with Mary Beth Murphy, Deputy Bureau Chief, Martha Heller, Chief, Policy Division, Maria Mullarkey, Assistant Division Chief, Policy Division, and Jonathan Mark, Attorney Advisor, of the Media Bureau, to discuss the status of ACA’s Petition for Waiver and to review the circumstances that support permanent relief for the limited number of analog-only cable systems that remain in operation today.¹

During the meeting, ACA reiterated the requests for relief articulated in its Petition, which seeks a permanent waiver of the requirement that video programming distributors (“VPDs”), including cable operators, pass-through emergency information via the secondary audio programming (“SAP”) stream² for analog-only cable systems which lack the equipment to comply or, in the alternative, asks that the deadline for compliance be extended for these systems for an additional five years. ACA repeated its arguments in support of relief, as stated in its Petition, and asked Media Bureau staff to grant the relief requested.

¹ *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, et al.*, MB Docket Nos. 12-107 and 11-43, Petition for Waiver of the American Cable Association (filed Mar. 9, 2018).

² 47 C.F.R. § 79.2. VPDs, which include cable systems, and video programming producers must ensure that emergency information provided visually during programming that is neither a regularly scheduled newscast nor a newscast that interrupts regular programming is accompanied by an aural tone and is made aurally accessible to individuals who are blind or visually impaired through the use of the SAP stream.

This letter is being filed electronically pursuant to Section 1.1206 of the Commission's rules.

Sincerely,

A handwritten signature in black ink, appearing to read "Elizabeth Cuttner". The signature is fluid and cursive, with a long horizontal stroke at the end.

Elizabeth Cuttner

cc: Mary Beth Murphy
Martha Heller
Maria Mullarkey
Jonathan Mark