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January 16, 2009

VIA EMAIL

Philippe Le Hégarret
W3C Interaction Domain Leader
World Wide Web Consortium (W3C)
plh@w3.org

Dear Mr. Le Hégarret:

Thank you for your liaison note of November 10th. As you know, CEA R4.3 is the body that develops and maintains CEA-608 and CEA-708 standards, the standards used in the United States (and elsewhere) for closed captioning of analog and digital broadcasts.

In your note, you seek to understand more details of the CEA-708 subset in use and related information for use in the Timed Text Recommendation the W3C Timed Text Working Group is working on.

You indicate that the group is aware of the FCC language relating to the subset of CEA-708 which is required. CEA does not have institutional knowledge of what subset of CEA-708 capabilities are being implemented in television receivers today, but it is safe to assume that receivers implement at least the minimum required by the FCC, and that some receivers implement CEA-708 in its entirety.

CEA does not provide interpretation of Government regulations. Attached is a summary of Part 15 requirements related to CEA-708 as developed by the working group in 2003 that may guide your review of the regulations. However, please note that no one should under any circumstances consider this document correct or complete without verifying whether that is true for them. Additionally, this document is provided as-is and is not legal advice.

Finally, you should note that receiver requirements (FCC regulations on receivers) aren't the same thing as requirements on content creators, who may choose any subset of the FCC requirements with assurance that receivers will be capable of producing the captions on screen. We suggest that if your desire is to understand what subset of CEA-708 is in use by the captioning industry, perhaps direct contact to caption service bureaus and professional equipment providers may be appropriate.

Philippe Le Hégaret
December 1, 2008
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Please let me know if I can be of any further assistance.

Kind regards,



Adam Goldberg
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Cc: CEA R4.3
Brian Markwalter, CEA
Wayne Luplow, Chair CEA R4
Sean Hayes
David Kirby
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Attachment (1)