



Date: October 2, 2012

RE: FCC IP Closed Captioning regulation

Dear BD-ROM Licensees:

It has come to the attention of the Blu-ray Disc Association ("BDA") that new regulations from the U.S. Federal Communications Commission ("FCC") [1] apply closed captioning obligations on "Video Programming Owners" ("VPOs") and "Video Programming Distributors" ("VPDs"), where the video programming distribution method uses the Internet Protocol. The new FCC rules also apply closed captioning obligations on manufacturers of "digital apparatus", including where playback is from "removable media".

Within the BD-ROM format, BD-Live may be used as a means to distribute video programming over the Internet Protocol to BD-ROM players. For the BD-ROM format the IPCC terminology would apply as follows:

- "VPO": BD-Live Logo License and Online Certificate Issuance Agreement Type-B Licensee
- "VPD": BD-Live Logo License and Online Certificate Issuance Agreement Type-B Licensee or 3rd party who provides BD-Live service on behalf of BD-Live Logo License and Online Certificate Issuance Agreement Type-B Licensee
- "digital apparatus" manufacturer: BD-ROM Player Model manufacturer
- "removable media players": BD-ROM Player Models
- "removable media": BD-ROM Movie Media

The BDA would like to call attention to licensees that the BD-ROM format currently supports delivery of closed captioning data in `cc_data()` "Captioning Data", within video elementary streams.

It is the BDA's understanding that the `cc_data()` in the BD-ROM specification provides technical means for "VPOs" and "VPDs" to deliver closed captioning data over BD-Live, and comply with the FCC IP closed captioning regulation. Therefore, where closed captioning obligations apply, licensees may distribute video programming over BD-Live with closed captioning data carried within `cc_data()`. Please consult with your authoring tool vendors for support for `cc_data()` insertion, and closed captioning data delivery formats specific to the authoring tool.

BD-ROM Player Model manufacturers should expect that closed captioning data will be delivered as `cc_data()` within video elementary streams. Closed captioning data support is optional within the BD-ROM format. However, pursuant to the IPCC regulation, where obligations apply, player manufacturer licensees may implement support for closed captioning presentation, user control and formatting, which is out of the scope of the BD-ROM format.

Blu-ray Disc Association
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Regarding the FCC IPCC rules, please consult with your legal counsel to determine applicable compliance deadlines, and identify necessary implementation and operation.

Please contact License Office if you have any questions specific to the BDA.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Kappei Morishita', written over a horizontal line.

Kappei Morishita

License Officer

Blu-ray Disc Association

[1] In the Matter of Closed Captioning of Internet Protocol-Delivered Video Programming: Implementation of the Twenty-First Century Communications and Video Accessibility Act of 2010, *Report and Order*, FCC 12-9, MB Docket No. 11-54 (rel. Jan. 13, 2012)