## APPROVED AND ADOPTED BY THE DISABILITY ADVISORY COMMITTEE June 16, 2016

## Recommendation of the FCC Disability Advisory Committee Video Programming Subcommittee

WHEREAS, the Federal Communications Commission has sought the advice of the Disability Advisory Committee ("Committee") on whether there is a consensus on formatting offline captioning in all upper case letters ("all-caps") or in a mixture of upper case letters and lower case letters ("mixed-case");

WHEREAS, consumer group members of DAC believe that mixed-case captions best serve the needs of most consumers;

WHEREAS, rendering mixed-case text in alternate presentation formats is easier in principle than the reverse;

WHEREAS, FCC rules require the inclusion of a selectable "small capitals" font in certain apparatus;

WHEREAS, FCC rules require certain apparatus to provide users with the ability to vary the size of captioned text and to provide a range of such sizes from 50% of the default character size to 200% of the default character size;

WHEREAS, some representatives of the Committee's Captioning Working Group believe that the small-caps font style and/or the ability to change the size of captions may serve as a workable substitute for consumers who prefer all-caps captions;

NOW, THEREFORE, IT IS --

RECOMMENDED, that as a best practice, captions for offline-captioned programming be produced originally in mixed-case;

RECOMMENDED further, that programming originally produced with all-caps captions need not be recaptioned in a mixed-case format;

RECOMMENDED further that the FCC and members of the DAC educate users about the availability of the options to modify mixed-case captions through use of various attributes in certain apparatus.