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Via Electronic Filing

April 28, 2025

Marlene H. Dortch, Esq.
Secretary
Federal Communications Commission
45 L Street NE
Washington, DC 20554

Re: *In Re: Delete, Delete, Delete* – GN Docket No. 25-133

Dear Ms. Dortch:

The Consumer Technology Association (CTA)¹ appreciates the opportunity to submit this reply comment in response to the Federal Communications Commission's (FCC or Commission) Public Notice on "identifying FCC rules for the purpose of alleviating unnecessary regulatory burdens."²

The significant number of filings in this proceeding show that stakeholders are eager for the FCC to achieve the deregulatory goals of this Administration. As the video marketplace continues to evolve and consumers access content in a variety of ways,³ it is imperative that the Commission remove outdated regulations governing video products.

Television

CTA requests the FCC eliminate rules specific to cable television capabilities.⁴ Much as consumers have moved away from watching linear broadcast programming, they also have other options beyond cable. Requiring television manufacturers to maintain product specifications particular to outdated and/or unpopular technology creates an undue burden on the manufacturer. As consumers have a growing number of entertainment options, it hinders the ability for manufacturers to innovate when they must adhere to these rules.

¹ CTA is North America's largest technology trade association, representing over 1200 American companies. We also own and produce CES®, which convened tech leaders and over 4500 exhibiting companies in Las Vegas in January. Our members are the world's leading innovators – from startups to global brands – helping support more than 18 million American jobs.

² *In Re: Delete, Delete, Delete*, Public Notice, GN Docket No. 25-133 (rel. Mar. 12, 2025).

³ Winslow, George. *Survey: Share of Homes with TV Antennas Falls to 19%*. (Apr. 10, 2025), <https://www.tvtechnology.com/news/survey-homes-with-tv-antennas-falls-to-19-percent-in-2025> (last accessed Apr. 28, 2025).

⁴ 47 C.F.R. §§ 15.115, 15.118, 15.123

CTA urges the FCC to remove the requirement for program blocking technology in television receivers.⁵ The changing content and media landscape means that parents have options to ensure programming is appropriate for their children to watch. This is another example of a technology mandate that does not meet the needs of consumers.

Closed Captioning

The FCC should reduce regulatory barriers for businesses to meet consumer accessibility needs. The Commission's rules on closed captioning display requirements⁶ are too prescriptive. The FCC should streamline these requirements so that the spirit of the rule (accessibility for consumers who are blind, low-vision, deaf, hard of hearing) is retained without the prescriptive language that makes technical implementation so complex and usability so poor.

The FCC has a legacy requirement to support 608/708 captions (CC)⁷ despite the benefits of some more modern formats, including Subtitles for the Deaf or Hard-of-Hearing (SDH). The Commission should relax the rule to allow flexibility in the caption format — if the caption feature is functional and meets performance objectives, the implementation of newer and emerging formats should be permissible.

Conclusion

To ensure America's continued leadership in technology innovation as outlined in [CTA's 2025 Innovation Agenda](#), we urge the Commission to delete the rules discussed above. CTA also encourages the FCC to exercise caution in enacting new regulations – especially those including technology mandates – that could increase regulatory uncertainty and costly manufacturing burdens on industry and consumers.

Respectfully submitted,

/s/ J. David Grossman

J. David Grossman
Vice President, Policy & Regulatory Affairs

/s/ Rachel Nemeth

Rachel Nemeth
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⁵ 47 C.F.R. § 15.120

⁶ 47 C.F.R. § 79.103

⁷ 47 C.F.R. §§ 79.100 (b)(1), 79.102 (b)