



**THUNDER BAY ELECTRONICS LIMITED**

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87 Hill Street North, Thunder Bay ON P7A 5V6

November 27, 2025

Canadian Radio-Television and Telecommunications Commission  
c/o Nanao Kachi,  
Director, Social and Consumer Policy  
1 Promenade du Portage  
Gatineau, QC J8X 4B1

***Filed electronically***

**Re: Annual closed captioning report for live programming during 2024-2025 and apparent non-compliance in 2023-2024**

Dear Mr. Kachi,

1. Thunder Bay Electronics Limited (TBEL) is pleased to file our 2024-2025 report on quality standards and efforts to improve closed captioning for live television programming on CKPR-DT and CHFD-DT and, in so doing, address our apparent non-compliance in 2023-2024 as outlined in your letter of October 8, 2025.

**Thunder Bay Electronics Limited closed captioning report for the period 2024-2025**

2. We acknowledge that there have been NER scores below 98 in 2023-2024 but would also highlight that each of the programs that did not meet the minimum NER threshold of 98 points scored 97.65 or higher and six programs had scores that were within 0.03 points of 98.
3. An examination of this data, however, has prompted us to reassess live closed captioning practices by reinforcing and improving staff training. Also, a key software upgrade was implemented earlier this year that significantly improved our scores.
4. For our live locally produced programming, we use ENCO's automated closed captioning system. Backed by positive industry reviews and successful in-house testing, we implemented the system in early 2019 and purchased a redundant system at the same time to mitigate problems in the event of a main system failure.
5. Our Master Control operators are trained to operate and troubleshoot the system while monitoring output throughout the day, safeguarding quality and addressing any impairments as they arise. A multi-screen viewer at each workstation allows them to monitor closed captioning OTA and on all BDUs available in our market.

6. Our Master Control operators immediately engage our Engineering technicians to correct any impairments.
7. Our engineers promptly escalate any issues to the ENCO Support Team, as required, enabling TBEL and ENCO to work together to keep our workflow running smoothly.
8. Our engineers also facilitate any system updates sent by ENCO, and in May 2025 the platform was updated from enCaption4 to enCaption5. At the same time, units were upgraded to the latest speech engine.
9. The new platform version enabled more operational enhancement features for the configuration and updating of the system. The improved speech engine continues to evolve and advance, enhancing accuracy. Ongoing housekeeping on our end – such as maintaining and updating filters and wordlists – together with these updates, has supported the higher accuracy ratings we've experienced in late 2024-2025.
10. We deliver our NER reports to ENCO, including all the evaluations that indicated apparent non-compliance. They report this as very helpful insofar as tangibly seeing where refinement and development efforts can be targeted. This led, in part, to the upgrades and the marked improvement in NER scores and viewer experience.
11. The technology consistently performs at a high level – typically exceeding 98 and, lately, on occasion 99, a score we have never received until the upgrade! But sporadic variances may occur and given the current financial and operational constraints, pursuing an additional NER evaluation for a video file submitted that scores below 98 has proven difficult.
12. Apart from live local programming we offer seven days a week, CKPR-DT and CHFD-DT carry a lineup that is predominantly provided to us through supply agreements with Bell TV and Corus. This programming is supplied to us with closed captioning embedded in the feed. We monitor this output for general quality and consistency, as well.
13. In addition, a team of in-house closed captioners caption all non-live local content (and some non-local programs and ads, as required) using CPC software. Processes are established to ensure this is completed before broadcast.
14. Viewer concerns and complaints regarding our closed captioning are responded to promptly by the Director of Programming. During 2024-2025, no complaints or concerns were received from viewers.
15. Video files, cc text files and NER evaluations have been made available to Nanao Kachi and Meghan Wawryk, both of whom have been invited to our Kiteworks server. There they can sign in with their email addresses, create passwords and play the files right from the folder or download them. For convenience, here is the link:  
<https://dm-sft01.dougallmedia.com/#/folder/b1c9519a-82a9-4e78-82a1-987f72807306>.
16. We have also sent a USB containing the video files, text files and supporting evaluations, as directed, to: Canadian Radio-Television and Telecommunications Commission, c/o Nanao Kachi, 1 Promenade du Portage, Gatineau, QC, J8X 4B1.

17. We thank the Commission for this opportunity to report on our closed captioning results over the past 12 months and look forward to continued improvements in the year ahead. Should the Commission have any questions regarding our report, please feel free to contact the undersigned.

2024/2025 NER Evaluation Scores for Live Closed Captioning									
Month	CKPR-DT				Month	CHFD-DT			
	Date	Score	Date	Score		Date	Score	Date	Score
Sep-24	18th	97.78	23rd	98.56	Sep-24	20th	98.46	24th	98.12
Oct-24	14th	98.21	16th	97.84	Oct-24	15th	98.24	17th	98.57
Nov-24	21st	98.15	25th	98.33	Nov-24	22nd	98.43	27th	98.55
Dec-24	24th	98.42	27th	98.01	Dec-24	26th	98.37	27th	98.24
Jan-25	20th	98.04	22nd	98.36	Jan-25	21st	98.22	23rd	97.88
Feb-25	10th	98.18	19th	98.26	Feb-25	12th	98.27	24th	98.46
Mar-25	11th	98.09	19th	98.19	Mar-25	12th	98.48	20th	98.34
Apr-25	7th	97.88	24th	98.30	Apr-25	9th	98.27	21st	98.13
May-25	7th	98.44	20th	98.01	May-25	13th	97.74	21st	98.97
Jun-25	2nd	98.80	11th	98.94	Jun-25	4th	98.72	19th	98.60
Jul-25	7th	99.04	24th	98.77	Jul-25	9th	98.92	29th	99.01
Aug-25	5th	99.13	20th	98.71	Aug-25	12th	98.54	29th	98.86

Note: The shaded area shows when enCaption’s upgrade was fully operational. Since then, NER scores have not fallen below 98 and, at times, even reached beyond 99 – an unprecedented milestone for our NER scores.

Best Regards,



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