

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554**

In the Matter of	)	
	)	
Accessibility of User Interfaces, and Video	)	
Programming Guides and Menus	)	Docket No. 12-108
	)	
	)	
	)	

**HONDA MOTOR CO., LTD. JANUARY 2018 STATUS REPORT**

**I. Introduction**

On March 16, 2017, the Federal Communications Commission issued a Memorandum and Order (Order) granting Honda Motor Co., Ltd.'s (Honda's) December 20, 2016 request for a limited waiver of the Commission's rules requiring the accessibility of user interfaces on covered digital apparatus for certain Honda vehicles — model years 2017 through 2019 of the Honda Pilot, Honda Odyssey, and Acura MDX. The waiver is subject to the requirement that Honda, on July 20, 2017 and January 20, 2018, provide the Media Bureau and the Consumer and Government Affairs Bureau (Commission Representatives) status reports on Honda's efforts to develop and integrate accessible technology for rear entertainment systems in the vehicles covered by the waiver. Honda's first status report was timely submitted on July 20, 2017.

As required on page 5 of the Order, Honda is required to file a second status report including the following items:

- An update on how Honda plans to make built-in video description and closed-caption functions accessible through a mechanism reasonably comparable to a button, key, or icon;
- A review of information about Honda's progress toward meeting all applicable accessibility obligations; and
- A detailed plan and timeline for achieving full compliance during the waiver period.

## **II. Update on How Honda Plans to Make Built-In Video Description and CC Functions Accessible Through Mechanism Reasonably Comparable to a Button, Key, or Icon**

The rules implementing Section 204 of the Twenty-First Century Communications and Video Accessibility Act of 2010 (the Act) require accessibility features be designed such that they “can be activated through a mechanism that is reasonably comparable to a button, key, or icon.” 47 CFR § 79.109(a)(1)-(2). Honda plans to make the Rear Entertainment System (RES) accessible to visually and hearing impaired passengers by making use of specific buttons on the RES’s included infrared remote to turn on accessibility and its corresponding features. Information about how visually and hearing impaired users can activate and navigate the accessibility features described below will be included in an Owner’s Guide supplied with each vehicle, as well as through manuals that are made available online. The online information will be made available in a form accessible to visually and hearing impaired users.

### **A. Alterations to Proposed Accessibility Activation Methods in Response to Study Feedback**

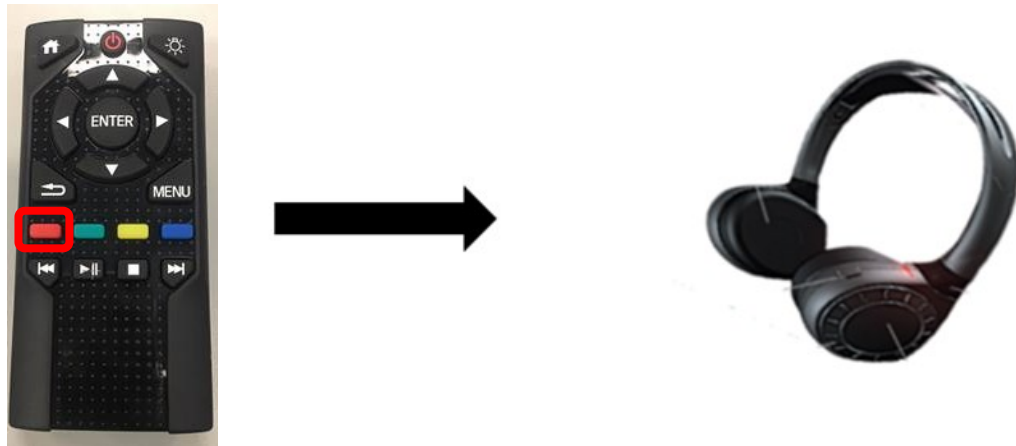
In its July 2017 status report, Honda proposed three methods, set out below, to activate RES accessibility features. On August 17, 2017, Honda met with the Commission Representatives at their offices in Washington, D.C. to discuss, among other items, the adequacy of these proposed methods. At that meeting the Commission Representatives directed Honda to engage in focus group testing to gauge and receive feedback on the usability and accessibility of the proposed methods. Honda commissioned such testing through Lextant and the Research Collective, which conducted a study at the Arizona Center for the Blind and Visually Impaired in December of 2017. The results of that testing are incorporated into the following review of the three activation methods proposed in the July 2017 status report, indicating how feedback from the study altered each of the proposed methods of activation.

First, Honda had proposed that a passenger would either press the “Home” key on the remote control four (4) times or select the accessibility features through the OnScreen Display menus to turn “Accessibility Mode” on and off. Upon doing so, the audio would announce through the headphones “Accessibility Mode Active.” Once in the Accessibility Mode, a user could press any button on the remote and the audio output would announce which button had been pressed. Honda has altered two components of these activation methods. First, instead of the “Home” key, passengers will utilize an existing red, rectangular button on the remote. The purpose for this change is to reduce the risk of buttons unintentionally exhibiting “dual functionality.” For example, a single press of the “Home” button is normally intended to take passengers to the Home screen; therefore, using multiple presses of a button with a function commonly used by the passenger presents risk of creating a frustrating user experience. The red rectangular button, like the other colored rectangular buttons on the remote, is much less likely to create such a risk as it is only functional when the RES is playing a BluRay disk, and then only if that specific BluRay disk has included on it features that utilize those colored buttons, which is less common than not. Second, passengers will only need to press the red rectangular button three (3) times, instead of four (4), to activate Accessibility Mode. This is a result of feedback from the study, where participants explained that their expectation was to use three presses, consistent with many Apple products, in conjunction with a consensual feeling among the participants that four presses were too many.

Therefore, the new proposal is that passengers will either press the red rectangular key on the remote control three (3) times or select the accessibility features through the OnScreen Display menus to turn “Accessibility Mode” on and off. Upon doing so, the audio will announce through the headphones “Accessibility Mode Active.” As before, once in the Accessibility Mode

a user can press any button on the remote and the audio output will announce which button has been pressed.

### **HOW TO TURN ON/OFF “ACCESSIBILITY MODE” VIA REMOTE**



**Press Red Button 3 Times**

**“Accessibility Mode Active” Audio**

Second, to turn on subtitles, Honda had proposed that a passenger would either press the “Enter” key on the remote control four (4) times or navigate through the OnScreen Display menus to turn subtitles on and off. Upon doing so, the audio would announce through the headphones “Subtitles Active.” For the same reasons as stated above regarding double functionality and participant expectations regarding accessibility activation, the “Enter” key has been replaced by the green rectangular button, which users will press three (3) times to activate subtitles. Additionally, using the green rectangular button to activate subtitles can also be used as a shortcut to activate the Accessibility Mode: the system is designed such that if the passenger has not activated accessibility before activating subtitles, the system will first activate and announce “Accessibility Mode Active,” and will then activate and announce “Subtitles Active.”

## HOW TO TURN ON/OFF “SUBTITLES” VIA REMOTE

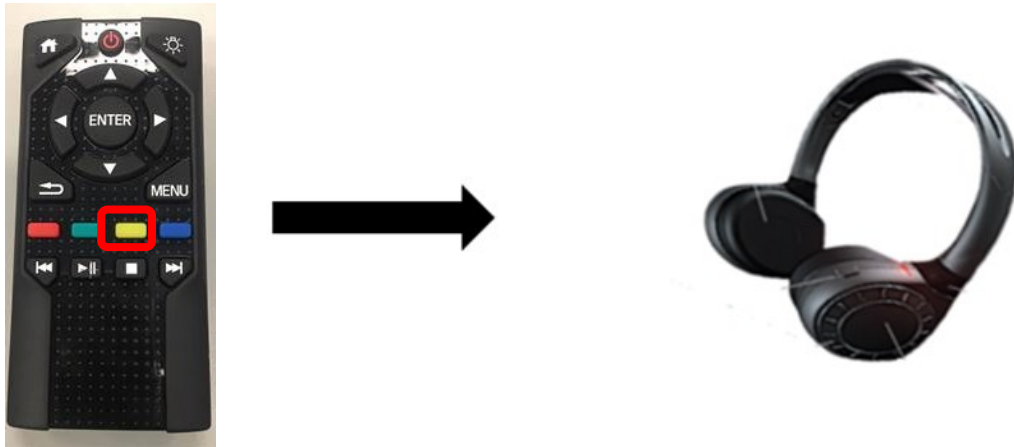


**Press Green Button 3 Times**

**“Subtitles Active” Audio**

Finally, to activate Secondary Audio (otherwise known as built in video description), Honda proposed that a user would either press the “Back” key four (4) times or navigate through the OnScreen Display menus to turn secondary audio on and off. For the same reasons as stated above, the “Back” key has been replaced by the yellow rectangular button, which users will press three (3) times to activate Secondary Audio. Additionally, as with the green rectangular button that can be used to activate subtitles, the yellow rectangular button can be used as a shortcut to activate Accessibility Mode: the system is designed such that if the passenger has not activated accessibility before activating Secondary Audio, the system will first activate and announce “Accessibility Mode Active,” and will then activate and announce “Secondary Audio Active.”

## HOW TO TURN ON/OFF “SECONDARY AUDIO” VIA REMOTE



**Press Yellow Button 3 Times**

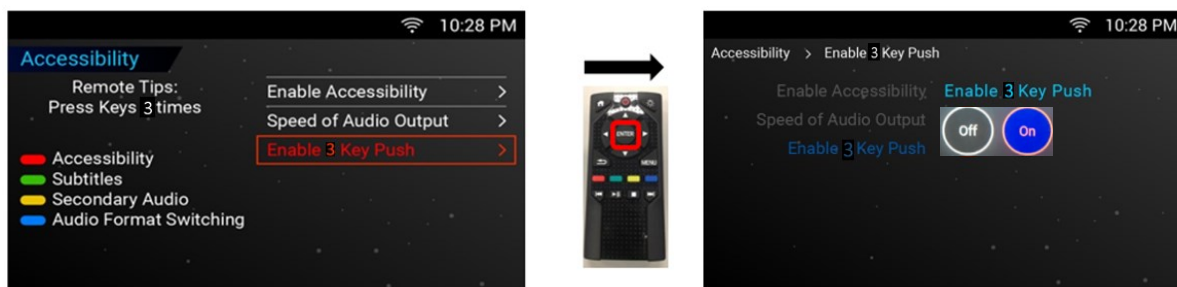
**“Secondary Audio Active” Audio**

### **B. Other Adjustments to RES Accessibility Features in Response to Study Feedback**

In addition to the changes made to the activation methods described above, Honda has also made adjustments to the OnScreen Display menus. Participants in the study indicated a clear preference for an “Accessibility” icon directly on the homepage, as compared to Honda’s proposed on-screen method of activating accessibility by navigating through the “Settings” icon. In response to that feedback, Honda has created a new “Accessibility” icon and placed it as the first icon displayed on the OnScreen Display menu, as pictured below.



Finally, the last option listed on the Accessibility menu is an option to “Enable 3 Key Push.” The system default setting is to have the three (3) key push functionality enabled, set to “On” as depicted below. Therefore, the multiple press option for enabling the accessibility functionalities described above will be “on” and enabled when the vehicle is newly purchased and the RES is first turned on: the “Enable 3 Key Push” option is intended as a way for passengers to disable the default setting if so desired.



### III. Information Regarding Honda’s Progress Toward Meeting All Applicable Accessibility Obligations

#### A. Honda is On Schedule to Meet the Compliance Deadline for Both the Pilot and Odyssey.

Honda has been diligently working to devise compliance schedules for the Pilot and Odyssey. For these vehicles, Honda is fully prepared to meet the compliance deadline by the waiver expiration date of August 20, 2018. Honda utilizes the same supplier for RES equipment used in both the Pilot and Odyssey, Supplier A (Honda does not have permission to disclose the entity name at this time). Consistent with the July 2017 report, Supplier A has continued to communicate to Honda that it anticipates being able to supply the equipment necessary to achieve compliance with the Act ideally by the end of July 2018, but in any event by expiration of the waiver in August 2018.

As of January 20, 2018, Honda has completed the following stages of achieving compliance for the RES systems in the Pilot and Odyssey:



- December 2016 – February 2017: Completed first phase of hardware design investigation.
- February 2017 – March 2017: Completed full compliance requirements investigation.
- March 2017 – June 2017: Completed investigation and finalized list of required system specifications.
- June 2017 – Present: Developing software and fixing bugs.

**B. Compliance Deadline for the MDX.**

As explained in the July 2017 report, Honda utilizes a different supplier for equipment used in the MDX's RES than with the other models, Supplier B (Honda does not have permission to disclose the entity name at this time). Over the past several months, i.e. after Honda submitted the December 20, 2016 waiver request and consistent with the July 2017 report, Supplier B and Honda have determined that the MDX's current hardware is incapable of supporting the software changes necessary to bring the MDX RES into compliance with the Act. Furthermore, Supplier B currently does not have the requisite expertise with the necessary hardware or software to bring the MDX's RES into compliance. As a result of these deficiencies, and after exploring various alternative options of trying to bring the MDX into compliance with the Act but not identifying any available compliant solution, Honda has begun plans to completely remove the RES from the MDX, in the absence of any other alternatives being identified.

Complete removal of the RES from the MDX was a last-resort countermeasure presented to the Commission Representatives at Honda's in-person meeting in Washington, D.C. last August. Consistent with what Honda communicated at the meeting, Honda continued to explore any available countermeasures with Supplier B, and even consulted Supplier C, which is independent of Suppliers A and B, in an attempt to identify any available methods of retrofitting the MDX's RES for compliance with the Act. Unfortunately, Honda believes it has completely exhausted all possible avenues for bringing the MDX's RES into compliance; therefore, it has

turned to what may be the only available compliant countermeasure: complete removal the RES from the vehicle. This plan will proceed in the absence of any other alternatives being identified.

As of January 20, 2018, Honda has engaged in the following steps towards creating a compliant MDX RES, which resulted in the current plan to completely remove the RES:

- December 2016 – February 2017: Completed first phase of hardware investigation for the memory chips and processor required to support accessibility.
- February 2017 – March 2017: Completed full compliance requirements investigation.
- March 2017 – September 2017: Continued investigation and problem solving regarding specifications necessary for the system to support accessibility. Additional concerns identified from Supplier B regarding the obstacles to implementing requisite hardware and software.
- September 2017 – Present: Final research on any available alternative countermeasures; begin planning removal of RES from MDX models in the absence of any other CVAA compliant countermeasures.

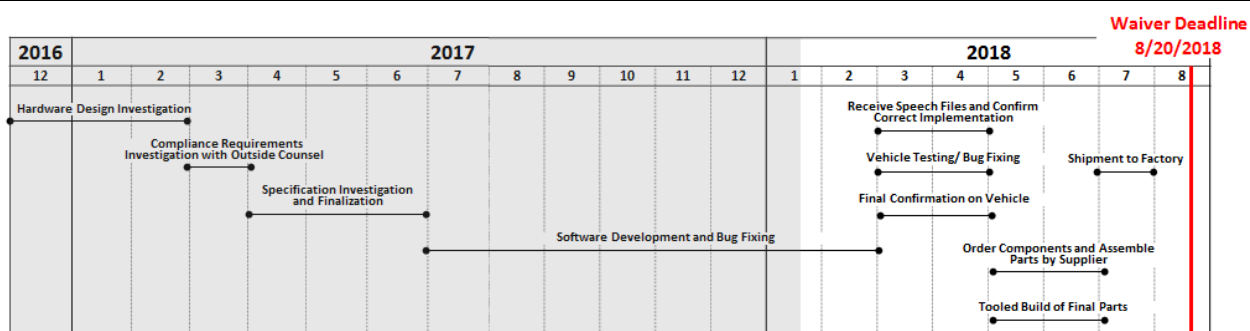
#### **IV. Detailed Plan and Timeline for Achieving Full Compliance During the Waiver Period for the Pilot and Odyssey**

As discussed above, Honda is fully on-track to meet the compliance deadline under the original waiver terms for both the Pilot and Odyssey. The following figure illustrates the steps remaining in the process to achieve compliance with the Act, and shows the approximate length of each step. Consistent with the timeline below (identical to the timeline provided in the July 2017 status report), Honda is on schedule and expects to achieve full compliance as to the RES for the Pilot and Odyssey by July 2018, before the waiver expires on August 20, 2018.

#### **PILOT AND ODYSSEY COMPLIANCE SCHEDULE**

Implementation Steps	Time Length	Completion
Preliminary Hardware Design Investigation (for memory chips and processors needed for speech output to headphones)	3 months Dec 2016 – Feb 2017	Complete
Compliance Requirements Investigation with Outside Counsel	1 month Feb 2017 – Mar 2017	Complete
Specification Investigation and Finalization	3 months Mar 2017 – Jun 2017	Complete

Software Development and Bug Fixing	8 months Jun 2017 – Feb 2018	Currently On Schedule
Receive Speech Files and Confirm Correct Implementation	2 months Feb 2018 – Apr 2018	
Vehicle Testing, Including Retesting of Hand-Modified Unit & Bug Fixing		
Final Confirmation on Vehicle		
Order Components and Assemble Parts by Supplier	2 months Apr 2018 – Jun 2018	
Tooled Build of Final Parts		
Supplier Parts to Be Built and Shipment to the Factory	1 month Jun 2018 – July 2018	



## V. Conclusion

Honda diligently worked to devise compliance schedules for the Pilot and Odyssey, and Honda is on track to meet the compliance deadline on or before the expiration of the waiver on August 20, 2018. As to the MDX, even with Honda's best efforts and negotiations with its supplier, due to the numerous technological and developmental hurdles applicable to the MDX RES, Honda has concluded that because there are no viable methods of bringing the RES into compliance with the Act, it must begin plans to completely remove the RES from the MDX in the absence of any other compliant alternatives being identified.

January 19, 2018

Respectfully submitted,

/s/ Andrew Emerson

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