American Council of the Blind

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Media Bureau

Federal Communications Commission

445 12th Street SW

Washington, DC 20554

RE: Comments on NCTA Petition for Waiver of Audio Description Rule – Proceeding 11-43

The American Council of the Blind (ACB) submits the following comment regarding the current petition filed by NCTA – The Internet and Television Association (NCTA) requesting reconsideration of the rules governing required video description of television programming, published under proceeding 11-43 on October 4th in the Federal Register (82 FR 46011).

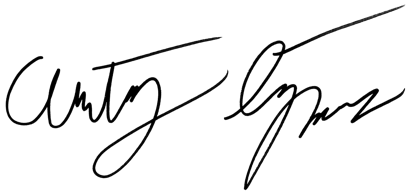
Throughout the drafting, passage, and implementation of the 21st Century Communications and Video Accessibility Act of 2010 (CVAA), ACB has been actively engage with stakeholders to expand equal access to television programming.  The CVAA was a significant bipartisan legislative achievement for Americans who are blind and visually impaired, in that for the first time, broadcast and cable television networks were given a roadmap toward achieving greater access for an audience that had been mostly ignored by content providers. Over the past half-century, the prime-time viewing experience has been a staple of American life — the cornerstone of water cooler conversations each Monday morning; the enjoyment of children’s programming that shapes identity and world view for up and coming generations; the actualization of Marshall McLuhan’s *Global Village*, weaving together narratives from around the world into television programming that defines who we are as a people. For decades, the leadership of industry and the Commission helped bridge access for millions of Americans who are deaf and hard of hearing, establishing today what is almost a complete saturation of captioned programming. However, it was not until the CVAA that Americans who are blind and visually impaired began to participate equally in this enjoyment, outside of a few goodwill measures taken by a handful of program providers.

While the CVAA is less than a decade old, broadcast, cable, and Internet content providers have made significant steps toward going above and beyond the requirements set forth in the legislation. Iconic institutions like the quadrennial Olympic Games now carry the same emotional thrill for viewers who are blind as any other viewer, thanks to the commitment of networks like NBC Universal who see the value of providing engaging content that is accessible to all audiences. ACB believes it will only be through such commitments that industry will move to make significant gains in providing equal access to programming for the blind, similar to Americans who are deaf and hard of hearing.

To that end, ACB recognizes that the expansion rule passed this July by the Commission was a necessary step forward toward laying the fundamental groundwork for described video content to gain any sense of scale that drives innovation capable of significantly expanding accessible programming while at the same time lowering costs. ACB has enjoyed a long history of working collaboratively with broadcast, cable and Internet to expand equal access for all audiences, and we stand willing to continue this work with content developers in the future to move industry beyond the necessary regulatory requirements. For this reason, we hope the Commission will continue to affirm its own commitment exercised this past July in its vote to expand video description.

ACB thanks the Commission for the opportunity to weigh in on the current petition for waiver under consideration.  Should the Commission have any questions pertaining to these comments, please feel free to reach out to me directly: [astephens@acb.org](mailto:astephens@acb.org), (202) 467-5081.

Sincerely,



Anthony Stephens

Director of Advocacy and Governmental Affairs

American Council of the Blind