

**Response to FCC Public Notice DA 19-40 dated February 4, 2019,
Regarding MB Docket No. 11-43.**

From: Fred and Kathy Brack, 8505 Davishire Dr, Raleigh, NC 27615
Date: February 26, 2019

As one of us (Kathy) is totally blind, we have found the benefits of Audio Description (referred to as Video Description as it applies to TV) to be enormous. For Kathy, watching a described television show adds so much more to the understanding of the show's content and appreciation for the overall artistic and theatrical experience intended by its creators and actors. As a sighted spouse, Fred has no problem listening to the description, and occasionally even benefits from it!

[Programming](#)

We generally watch TV together each evening, and for the reasons above, the first criteria in choosing a new series to watch is whether it offers description. We have enjoyed the NCIS series on CBS and Law and Order SVU on NBC for years, for example. We realize, though, that unlike closed captioning which benefits the Deaf and Hard of Hearing community, only a small percentage of television shows are described for people who are blind or have low vision. We sincerely regret the lack of description on other shows we enjoy such as Madam Secretary and The Blacklist. We strongly urge Congress and the FCC to require a *much higher* percentage of described programming than is required today; and in the long term, the requirement for description should equal the requirement for captioning, shouldn't it? The question of describing live content should also be addressed.

Though not applicable to our family, we are pleased to observe the so-called Litton blocks of children's described programming on Saturday mornings on four networks.

However, of particular frustration is the minimal, inaccurate, or non-existent effort that some networks expend to advise us of what shows are described, which is particularly important considering the relatively small number. The prime offenders are Fox and HGTV, though to Fox's credit, they seem to describe more shows than anyone else. Although not within the FCC's mandate under the Communications Act, this lack of attention is particularly noticeable for PBS, whose abundance of described programming, especially for children, goes undocumented.

Technology

While the television industry successfully moved from analog to digital, the digital technology and the standards defined for it do not appear to have matured to the point where we can have more than one alternate audio track per show. Having a blind English-speaking person in the family, we are only interested in receiving English Audio Description tracks; however, we recognize the legitimate interests of the large Spanish-speaking population in America that would like to hear Spanish audio when available. This causes a conflict for use of the one available so-called Second Audio Program channel. While this has not been a particularly prevalent problem for us, we urge the FCC and Industry to address the need for two (or more) alternate audio tracks being made available for reception on home equipment. Another future objective should be the ability to direct an alternate audio track to earphones (presumably via Bluetooth technology), so not everyone in the room needs to listen to it (either description or a different language).

Regarding technology on the TV and cable/satellite boxes and remotes, it is generally too difficult to turn either description or an audio guide on and off. These functions need dedicated buttons! Kathy relies on Fred to handle most of this, unfortunately. The industry needs to recognize that a person without sight has to “remember” how many key presses are necessary to choose a new option, and mistakes are easy to make, so they should be easy to correct. Hopefully the FCC can introduce requirements in this area. Having an audio guide is not enough, if it is hard to turn on and off! (It is six key presses on our DirecTV remote, for example.) And a suggestion: Define and mandate an industry-standard tone to be sounded at the start of each described show, so a blind user knows definitively when to activate the description channel.

While we don't utilize Network video-on-demand, we are only aware of ABC's support of description in their smartphone App.

Summary

In summary, Video Description on TV has been a huge enhancement for enjoyment and full appreciation of the rich content available out there for Kathy, but accessing the description via remote controls and finding all the described shows she might be interested in remains a significant frustration and challenge. Nevertheless, the Twenty-First Century Communications and Video Accessibility Act of 2010 was a much-appreciated huge step forward, and the FCC's work administering it is gratefully acknowledged. Now let's just keep moving forward!

*** END ***