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May 1, 2019

Honorable Ajit Pai, Chairman

Federal Communications Commission

445 12th Street SE

Washington, DC 20554

Re: Reply Comments to Media Bureau on Video Description Marketplace Improvements (DA 19-40)

Dear Chairman Pai:

The American Council of the Blind (ACB) thanks the Federal Communications Commission (Commission) for continuing this dialog on improvements to the video description marketplace covered under the 21st Century Communications & Video Accessibility Act (CVAA)( PL 111-260). ACB believes the comments filed under this request demonstrate the success that has come through the CVAA toward making a key part of American life accessible for individuals who are blind and visually impaired. At the same time, we believe the comments received by the Commission demonstrate a clear need and desire for increased availability and usability of video described programming.

In the comments filed for this proceeding, ACB believes that consumers have clearly demonstrated the demand for and the benefits of video described programming. Consumers with access to video described programming report being more integrated in their community and less isolated. These benefits of video description should not remain limited to Americans in certain designated market areas. ACB recommends that the Commission use its existing authority “to phase in the video description regulations for up to an additional 10 designated market areas each year,” beginning in 2020.[[1]](#footnote-1)

As stated in the comments filed by Litton Entertainment, ACB agrees that video described educational programming plays a vital role in the development of disabled children, as well as of children with disabled family members and friends, because the programming increases the level of engagement by the viewers and allows for more in-depth interaction by all audience members. As the Commission analyzes the benefits of video described programming, ACB recommends the Commission use its existing authority to increase the amount of video described programming by an additional 75 percent, with continued consideration given to highly valued content, such as primetime and children’s programming.[[2]](#footnote-2)

ACB is thankful for the Multichannel Video Programming Distributers (MVPDs) and broadcasters who make available television listings of available video described content. Currently, the ACB Audio Description Project (ADP) website is one of the few aggregated sources of all available video described content in the U.S. The ADP listing is compiled by manually verifying all other listings of available video described content. This is a time intensive process performed only after video described programming is publicly listed. ACB recommends a standardized digital identifier for content producers to designate video described programming. With content labeled by the producer, broadcasters and MVPDs could accurately share what programming is video described via their website and with television programming aggregators in a timely fashion.

In our original comments filed on April 1, ACB inadvertently stated that Hulu “has begun to provide live broadcast programming with audio description.” Through collaboration with ACB, Hulu has begun to provide certain on-demand programming with audio description, including some of their most popular original content. Hulu is not currently providing audio description for live-broadcast programming. Hulu, Netflix and Amazon Prime are industry leaders offering video described programming over internet streaming services. As growing numbers of Americans seek video programming over the internet, it will become more imperative that streaming video providers, broadcasters and covered entities pass through audio description, as well as create audio description for original programming, for video described content to be consumed online, so that people who are blind are not left behind.

ACB thanks the Commission for the opportunity to weigh in on this important issue. If you have questions pertaining to these reply comments, or need further information, please do not hesitate to contact ACB.

Sincerely,

Clark Rachfal

Director of Advocacy and Governmental Affairs

American Council of the Blind

1. 47 U.S.C. Section 613 (f)(4)(C)(iv). [↑](#footnote-ref-1)
2. 47 U.S.C. Section 613 (f)(4)(B). [↑](#footnote-ref-2)