American Council of the Blind

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Consumer & Governmental Affairs Bureau

Federal Communications Commission

445 12th Street SW

Washington, DC 20554

RE: Public Notice Comments – Accessibility of Communications Technologies (CG 10-213)

The American Council of the Blind (ACB) submits the following comments to the Federal Communications Commission (Commission) April 4, 2018 public notice for comment on the 2018 21st Century Communications and Video Accessibility act (CVAA) Biennial Report to congress. ACB is the nation’s leading grassroots consumer organization for Americans who are blind and visually impaired.

ACB strives to expand independence, equal inclusion and opportunity for the millions of Americans who are blind, and we recognize that advancements in communications technologies plays an integral part toward achieving full access and inclusion in the 21st century. Throughout the drafting, passage, and implementation of the CVAA, ACB has been actively engaged with stakeholders to expand equal access to traditional, advanced, and mobile telecommunication systems. These systems, covered under Sections 255, 716, and 718 of the CVAA, continue to make life-changing advancements, particularly in the smart-phone sectors, where accessible connectivity to Internet applications has resulted in a watershed of innovative solutions that make not just media and standard web communications accessible, but leverage smartphone technology to make the surrounding physical environment accessible for people who are blind through augmenting the human senses.

ACB has been fortunate over the past year to work closely with telecom providers, striving to improve access to traditional and advanced telecommunication systems. A recent example of success in this arena was the release of a software upgrade for Cisco’s 8800 series flagship VOIP phone. This new upgrade, released in March 2018, offered businesses the first desktop office VOIP phone with built-in accessibility. This achievement offers greater accessibility in the workplace, available at any 8800 Series phone that received the free software update.

Since the last biennial report, ACB has also been engaged with providers of advanced communication systems. As more and more technology and workplace productivity solutions move into the Cloud, ACB has advocated for assurances that such systems will remain accessible for users who are blind and visually impaired. ACB believes it is important to pay particular attention to this space for the foreseeable future. More and more, businesses are relying upon workplace productivity solutions and office networking solutions that make businesses more efficient and collaborative. In order for Americans who are blind and visually impaired to maintain a competitive edge in the workplace, it is critical to assure that such systems and virtual workplace platforms with integrated advanced communication systems remain accessible. Our hope is that the World Wide Web Consortium (W3C) forthcoming revisions to the Web Content Accessibility Guidelines (WCAG) will provide a roadmap for developers to assure that software design of such platforms can be designed in the most accessible manner. This past January, we were fortunate to have the refresh of Section 508 go into effect, which harmonized parts of the CVAA like Section 255 into the new federal government electronic communication guidelines. This further shows that the CVAA is having significant impact across sectors toward unlocking accessibility for those who rely on interaction with telecommunication technologies.

From a mobile communications vantage, ACB has been pleased to work with all the leading mobile operating system developers to improve accessibility for consumers who are blind and visually impaired. Over the past two years, performance in text-to-speech and voice dictation have increased significantly. Voice assistance platforms like Alexa, Siri, and OK-Google have transformed the way people who are blind communicate with both peers and smart devices, advancing accessibility in areas that were unthinkable only two years ago. The smartphone has led to a revolution in smart homes and other ways to interact in society, allowing for greater inclusion of people with disabilities.

Furthermore, introduction to affordable mobile devices, such as Amazon’s Fire tablet, Google’s Pixel XL, and Apple’s IPhone SE, have provided access to high quality flagship devices at a price point that is more reasonable for budget conscious consumers. Additional telecommunication developers using the Android operating system continue to push out into the market devices that are even more affordable without losing the access to built-in accessibility controls with Android’s Talkback. And with each update to Android pushing out improvements to their system settings for accessibility features, along with continued outreach for developers to follow accessibility guidelines spelled out in Android’s developer’s toolkit, ACB believes accessibility and usability will continue to improve under Section 718 of the CVAA.

This being said, ACB has significant deep concerns over third-party development of content. The ongoing failure for the Department of Justice to issue clear guidance on web accessibility standards under Titles II and III of the Americans with Disabilities Act (ADA) remains a major issue for access to web content. While this issue is outside the regulatory scope of the Commission, it remains interconnected in so much as to say that key concerns over accessibility under Section 718 are with independent content providers, who continue to fail to script their content in a manner that adheres to international standards set forth in WCAG 2.0. Mobile applications cover every scope of creativity, productivity, and social networking ventures. Communications technologies frequently thrive within this space. However, there are no real concrete benchmarks that guarantee accessibility remains consistent. Even for developers who have a solid track record of producing accessible content, OS updates and other variable factors can result in broken applications resulting in failure to participate equally on mobile applications and across mobile platforms. .

ACB thanks the Commission for the opportunity to weigh in on the upcoming 2018 CVAA Biennial Report to Congress. 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