

May 9, 2018

Consumer & Governmental Affairs Bureau  
Federal Communications Commission  
445 12<sup>th</sup> 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 addendum to its May 3, 2018 comments to the Federal Communications Commission (Commission) April 4, 2018 public notice for comment on the 2018 21<sup>st</sup> 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.

In its aforementioned comments filed with the Commission on May 3, 2018, ACB drew attention to the affordability of new smartphone devices with robust built-in accessibility features. We subsequently wish to provide additional comments on feature-rich non-smartphones, which were not included in our May 3<sup>rd</sup> comments. While there have been improvements in the smartphone market since the last CVAA biennial report by the Commission to Congress, there are still individuals who are unable to afford or independently access smartphones. Companies like Odin Mobile – [www.odinmobile.com](http://www.odinmobile.com) – have worked to bring phones to individuals in this subsection of the accessible mobile phone market for people who are blind and visually impaired; however, as of May 8, 2018, all of the phones offered on their website are out of stock. As it pertains to more accessible, feature-rich non-smartphones, there exists a primary concern over a shortage of supply against a potential increase in demand.

The Centers for Disease Control (CDC) projects in their Vision Health Initiative a significant increase in the prevalence of blindness over the next 20 years<sup>1</sup>. This increase continues to rise significantly within the older adult population. Communities of color also are experiencing an increase in blindness, due in part to diabetes being the leading cause of blindness now among working-age adults. Both of these populations face structural barriers that impede economic opportunity, which in turn makes it more difficult to afford more costly smartphones, which usually have more costly data plans.

Juxtapose the increase in demand with the decrease in supply, and it is clear there must be greater commitments by providers to push forward accessible solutions like that presented by Odin Mobile. In the February 2017 issue of AccessWorld, published by the American Foundation for the Blind (AFB), current feature-rich non-smartphones were discussed<sup>2</sup>. The article also discussed concerns over lack of information and quality customer service capable of assisting with choosing, purchasing, and utilizing

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<sup>1</sup> CDC. Vision Health Initiative. Accessed May 9, 2018 at: <https://www.cdc.gov/visionhealth/home/index.html>

<sup>2</sup> Pauls, Jamie. (Feb. 2017). "Cell Phone Accessibility: Easier to Use Cell Phone Options for People Who Are Blind." AccessWorld, Vol. 18, No. 2. American Foundation for the Blind. Accessed online May 8, 2018 at: <https://www.afb.org/afbpress/pubnew.asp?DocID=aw180206>.

what few accessible non-smartphones are on the market. While the article mentioned several phones across the top four carriers, it set forth a troubling reality that in some cases accessible phones were no longer being manufactured, and one of the more popular phones was from 2011 – quite a long product life span for any mobile communication device. Following a May 9<sup>th</sup>, 2018 online chat with customer service representative for the carrier receiving the most accolades in the article, the phone most praised for accessibility is no longer available by the carrier.

In light of this, ACB is concerned that these devices will become harder and harder to find, limiting essential accessibility to a group unable to secure or use smartphones. ACB will continue to work with manufacturers and providers to encourage solutions that assure all mobile communications are made accessible for blind and visually impaired users. We thank 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,

A handwritten signature in black ink, appearing to read "Anthony Stephens", with a stylized, flowing script.

Anthony Stephens  
Director of Advocacy and Governmental Affairs