

Marlene H. Dortch
Secretary
Office of the Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: Google Fiber's Amended Petition for Limited Waiver of Accessible User Interfaces
Requirements (DA-19-430; MB Docket no. 12-108)

Dear Ms. Dortch:

The American Foundation of the Blind (AFB) welcomes the opportunity to reply to comments on the Federal Communications Commission (FCC) request for comments on Google Fiber's amended petition for limited waiver of accessible user interfaces requirements. Our work on the 21st Century Communications and Video Accessibility Act (CVAA) stems from a deep belief in the power of technology to contribute to a world of no limits for the more than 25 million Americans who are blind and visually impaired. We work with both policymakers and technology creators to ensure that products are accessible and useable by all people and that technology fully achieves its potential to promote equity and create new opportunities.

AFB acknowledges the substantial progress that industry has generally achieved in complying with the FCC's rules implementing the CVAA. Nevertheless, we remained concerned that nearly ten years after the CVAA was passed, accessibility too often remains an afterthought during the product design process. With that concern in mind, AFB wishes to echo the concerns of the American Council of the Blind (ACB) and the National Federation of the Blind (NFB) in their comments to the FCC regarding Google Fiber's petition to waive its navigation device accessibility obligations.

Both ACB and NFB noted that the waiver petition seems to demonstrate a lack of seriousness in addressing accessibility for people who are blind and visually impaired. By judging the four functions in question to be "less-frequently used," Google Fiber is further limiting independent access to the very functions that make video programming more accessible to people who are blind and visually impaired. We hope that Google Fiber will in fact be able to correct the video description and captioning functions within a matter of months and will expedite finding an accessibility solution for the other two functions without regard to frequency of usage.

Additionally, as ACB also highlighted, Google Fiber does not lay out a specific plan for addressing the audible accessibility of the functions in the waiver requests. We are concerned

that addressing accessibility does not seem to have been considered when the decision was made not to implement Android and that, without a stronger commitment to incorporating accessibility into its devices and apps, Google Fiber products and the video programming they deliver will remain inaccessible to users who are blind or visually impaired.

In addressing these concerns, we welcome the opportunity to collaborate with Google Fiber and other industry partners as they innovate to ensure full usability of their products for people with disabilities. We thank the FCC for the opportunity to express our concerns and reply to the comments on this issue. Should the Commission wish to follow up about these comments, please contact Sarah Malaier, Public Policy and Research Advisor, at smalaier@afb.org or 202-469-6831.

Sincerely,



Stephanie Enyart
Chief Public Policy and Research Officer
American Foundation for the Blind