

Subroof

95-174

February 5, 1996

FCC Chairman Reed Hundt
Office of the Secretary
Federal Communications Commission
1919 M Street, N.W.
Washington, D.C. 20554

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Dear Chairman Hundt, et al:

This letter from the Board of Directors of Radio Information Service, southwestern Pennsylvania's only reading service on the radio, is to respond to the Notice of Inquiry (FCC 95-484). We specifically address the issue of adopting as a standard, in television broadcasts, descriptive video techniques for people who are vision-impaired.

Television incorporates both visual and audible information to present its messages to the public. That a portion of the public cannot now utilize the full scope of the messages being broadcast has been largely overlooked or even ignored by television manufacturers and the broadcasting industry. We submit that, because broadcasters are licensed to serve the public and because people who have vision impairments are a significant portion of that public, then descriptive video must be incorporated into any and all transmissions for the public.

According to 1990 statistics released by the American Foundation for the Blind, 4.3 million Americans cannot read print due to visual impairments. This population is growing larger each year, as the number of visually impaired elderly increases. Television manufacturers and broadcasters must be convinced to cease ignoring the needs of so substantial a population.

Currently, the vision-impaired television audience has no indication that vital information ranging from emergency instructions such as storm warnings, flood warnings and school closings are displayed on television "scrawls" across the screen nor do they know that live or pre-recorded news footage is being presented in a box behind reporters. The results of not knowing can be irritating, misleading, or even deadly. The best interest of the public is more fully served by incorporating descriptive video as a part of the broadcast.

Descriptive video would capture the entire visual element for the broadcast including: colors, setting, facial expression, action, etc. effectively substituting for the video presentation as it is delivered to the general public. The material most barren of spoken information, and thus most in need of video description, cannot be provided through any other means.

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An action-filled or dramatic program that has long sequences without dialogue must have a descriptive narrative in order for a visually impaired person to follow what is being displayed. Programs without this are totally useless.

You might think that larger television markets (with a higher population of visually impaired people) would already be enjoying descriptive video. It is not the case. Even though the visually impaired community has made its desire for the service very clear to public and commercial broadcasters alike, there is no video description available in the Pittsburgh market.

The responsibility for incorporating descriptive video falls, in our opinion, on the originator of the programming and on the television manufacturers. Local stations should handle their own productions while the networks they are affiliated with deal with the program producers they buy programming from. Live presentations would either require interactive, participatory narrations or a change in the method of reporting by the presenter.

The adoption of descriptive video programming as the norm must be affordable to the people it will serve. Most members of the visually impaired population are unemployed or under-employed and live on a low, fixed-income. This means that creating a video description system that requires expensive adaptive equipment will not serve their needs.

We believe that the cost of providing descriptive services would shrink tremendously were they incorporated in the production work, not added after the fact. Likewise, television manufacturers should produce sets which can, for example, reproduce "secondary audio programming" as the standard, not as an exception.

We do not support nor recommend that any new television set be produced and sold in the U.S. without the ability to include descriptive video. This would require that a standard be implemented for broadcasters to incorporate descriptive video narrations no matter how the signal is delivered to the set (analog or digital).

There will be some who will claim that these adaptations to program production, broadcast techniques, and equipment manufacture are too expensive to implement. This is a short-term view and as an argument against adoption of descriptive video, seriously flawed.

Television stations will be expanding their "market share" by an additional 1.7% simply by programming accessibly to the visually impaired population. A larger market share translates into larger advertising revenues. Those revenues will be available to television stations for many years to come, continually supplying them with the added capital to keep descriptive presentations on the air.

RIS has first-hand experience dealing with similar arguments against televised material for blind populations such as "the blind don't buy TV's" or "blind people don't buy cable service". In our radio reading service area (12 Counties of southwestern Pennsylvania), there are a dozen cable system operator providing our reading service to their subscribers who are blind. These operators would not be using valuable space in their cable system spectrum for a reading service for the blind if they did not realize a return.

There are nearly 7,000 people who currently use this reading service in southwestern Pennsylvania. They represent approximately 12% of the population which is eligible to use RIS. We urge the FCC to move from the study phase to implementation of mandatory descriptive video as it is in the public interest.

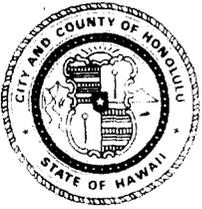
Very Truly Yours,

A handwritten signature in black ink, appearing to read "A. H. Evancic". The signature is written in a cursive style with a large initial "A" and "H".

Anthony Evancic
Secretary, RIS Board of Directors

95-174

Handwritten signature



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January 29, 1996

Chairman Hundt and
Commissioners Quello, Barrett, Ness and Chong
Federal Communication Commission
1919 M Street, NW
Washington, D.C. 20554

DOCKET FILE COPY ORIGINAL

Re: Response to Notice of Inquiry, December 1, 1995 (FCC 95-484)

Dear Commissioners,

Please accept my comments on the following issues:

1. The public interest benefits of closed captioning and video description.

The benefits to deaf and hard-of-hearing citizens from closed captioning are significant. Indeed, closed captioning of televised governmental proceedings is a necessity if we are to have truly open government. I am proud that the Honolulu City Council has recently implemented the law I authored to provide for real-time captioning of all televised proceedings, opening City government to the more than 75,000 deaf and hard-of-hearing citizens.

2. The current availability of closed captioning and video described television programming, including the degree to which availability varies by program source, program type, market size and other factors.

My friends at the Aloha State Association for the Deaf have informed me that the prevalence of captioning services in society is increasing. However, there is still insufficient captioning to meet the needs of the deaf and hard-of-hearing community. Clearly, there is a need for more captioning. In general, major television entertainment and news shows, including those featured on the four primary broadcast networks, on CNN, and on C-SPAN, provide significant captioning. But local television stations, at least in Hawaii, do not as yet provide adequate captioning services.

3. The potential impact of advanced television and digital technologies on the availability of closed captioning and video description.

I am not an expert on advanced television and digital technologies. However, I do know that closed captioning can provide useful by-products through the use of other technologies. For instance, as a result of the Honolulu City Council's captioning program, written transcripts of Council meetings are now

available to the public for the first time ever and can be obtained for free via my World Wide Web home page.

4. The cost of closed captioning and video description, as well as the current sources of supply and funding for these services.

Our experience at the Honolulu City Council has led us to conclude that there are not enough companies and individuals who can provide professional captioning services. Indeed, we received only one bid after releasing our request for proposals for the captioning program. More competition in the marketplace will increase the efficiency of captioning programs.

5. The market incentives for closed captioning and video description.

Deaf and hard-of-hearing citizens are a significant component of our society. However, they do comprise a minority group. As such, they are not a strong market force. Therefore, I do not see strong market incentives for closed captioning and video description. Government action is necessary.

6. What if any measures the Commission should take to promote closed captioning and video description.

Television coverage of public meetings involving governmental bodies must be captioned to ensure that democracy's promise of open government is realized. Additionally, important and popular news, entertainment, and educational television shows should be captioned to the greatest practicable extent. As noted above, market forces are insufficient to ensure that such captioning services are actually provided. Therefore, I believe the FCC should condition the granting of television licenses on the applicant's promise to provide captioning.

7. In the event mandatory requirements are deemed necessary, the general form that they should take.

As indicated in the previous section, I believe the FCC should secure promises that broadcasters will provide captioning services before granting licenses. Additionally, the FCC may work with Congress and state and local governments to ensure that funds, personnel, and equipment are available to provide closed captioning of as many government meetings as possible.

Thank you for accepting my commentary.

Very truly yours,



ANDY MIRIKITANI
Councilmember, District V