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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of	)	
	)	
Implementation of Section 255 of the Telecommunications Act of 1996	)	
	)	WT Docket No. 96-198
Access to Telecommunications Services Telecommunications Equipment, and Customer Premises Equipment By Persons With Disabilities	)	

To: The Commission

MOTION TO ACCEPT LATE-FILED COMMENT

The National Coalition for Blind and Visually Impaired Persons for Increased Video Access ("National Coalition") hereby requests that the Commission accept the attached Report and make it a part of the record in this Docket. The Report is being presented to the Commission in connection with its Congressionally mandated investigation into the feasibility of increased video description over the mass media. (See MM Docket No. 95-176) In addition, however, we believe that the proposal set forth in the Report is directly pertinent to this proceeding, because the Telecommunications Act of 1996 requires providers of telecommunications services to ensure that their service is accessible to and usable by individuals with disabilities, if readily achievable.

The focus of the NOI in this Docket was on equipment-related solutions to accessibility issues. However, the National

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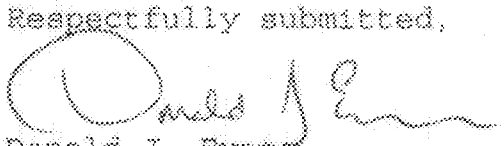
Coalition believes that various telecommunication service providers (such as cable television operators, video-on-demand providers, etc.) are required by Section 255(c) of the Telecom Act to deliver video programming together with video description so as to make their service accessible to the blind. This mode of ensuring accessibility relates more to the manner of delivering certain kinds of service rather than the equipment used to deliver it. Because this key aspect of the import of Section 255 was not fully considered in the NOI, the National Coalition's Report on the subject will provide a useful exposition of the issue and should be included in the Docket.

Respectfully submitted,



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For Increased Video Access

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February 10, 1997