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COMMONWEALTH OF THE NORTHERN MARIANA ISLANDS
GOVERNOR'S DEVELOPMENTAL DISABILITIES COUNCIL

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**Assistive Technology Project
STRAID**



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FCC MAIL ROOM

Federal Communications Commission
Office of the Secretary
1919 M Street, NW, Room 222
Washington, D.C. 20554

Dear Sir:

On behalf of the Commonwealth of the Northern Mariana Islands (CNMI) Governor's Developmental Disabilities Council's Assistive Technology Project, I would like to press out some comments in regard to the rules proposing to enforce Section 255 of the Telecommunications Act as follows:

1. Access Board Guidelines-

These guidelines are needed to provide clear guidance on the obligations of companies to make their products and services accessible. Telecommunications access is really vital in enhancing productivity, competency, employability, independence and full inclusion of people with disabilities.

2. Readily Achievable-

We are opposing the proposal of allowing the companies to consider the extent to which the costs of providing access will be recovered. Allowing this as a "readily achievable" factor would defeat the purposes of Section 255. In fact, until now we do not have access to many telecommunications services, including voice mail, interactive telephone systems, call forwarding and many others.

3. Enhanced Services-

These include more advanced telecommunications services, such as voice mail, electronic mail, interactive voice response systems and audiotext information. Although many of these services have become common in some places, they still remain inaccessible to people who are deaf, hard of hearing, blind and visually impaired, thus, making them second class citizens with respect to new telecommunications technological advances.



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Member of National Association of Developmental Disabilities Councils

Member of RESNA

Member of Association of ADA Coordinators



To support this, a person who is blind cannot even use a piece of telephone equipment because key information is available only on a visual display; someone who is deaf cannot use an equipment in which the crucial status or content information is conveyed only by auditory means; an individual with motor or dexterity limitations cannot even operate a product with intricate buttons; and a person with a cognitive disability cannot access, for example, a voice menu because it goes by so fast, thus, there is no more time to write down or remember the options. Again, covering enhanced services is critical to full telecommunications access and consequently, will increase the opportunities of people with disabilities to become more employable, competent, productive, independent and fully included in the community.

4. Complaint Process-

I strongly support FCC's proposals on the following:

- a. No filing fees for informal or formal complaints with the FCC against either manufacturers or service providers;
- b. No time limit for filing complaints since nobody knows when the product or service can be discovered to be inaccessible;
- c. Submission of complaints by consumers with disabilities can be done in any available accessible means or ways; and
- d. Manufacturers and service providers should be required to establish contact points in their companies that are accessible to consumers with disabilities.

Your favorable consideration is greatly appreciated.

Thank you very much.



Sincerely,

Remay T. Rios
Acting Assistive Technology Project Director

xc: Mr. Dan Camacho, Chairman, AT Advisory Board
Celia B. Lamkin, M.D., AT Project Coordinator
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