



**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20054**

Accessible Emergency Information, and Apparatus)	
Requirements for Emergency Information and Video)	
Description; Implementation of the Twenty-First)	MB Docket No's: 12-107, 11-43
Century Communications and Video Accessibility)	
Act of 2010)	

**COMMENTS OF THE
AMERICAN COUNCIL OF THE BLIND AND THE
AMERICAN FOUNDATION FOR THE BLIND**

The American Foundation for the Blind (AFB), in collaboration with the American Council of the Blind (ACB), is pleased to offer these concise comments on the petition¹ requesting that the Commission grant a temporary partial exemption and limited waiver of the Commission’s rules requiring broadcasters to provide an aural representation of visual emergency information on a secondary audio stream. Accessible emergency information is essential to the health, safety and wellbeing of all people living with vision loss, and it remains our firm belief that the historic Twenty-First Century Communications and Video Accessibility Act (CVAA), building on the existing authority of the Communications Act generally, has positioned the Federal Communications Commission (Commission) well to ensure that broadcast and related television can be an effective means for the delivery of emergency information that is useful for viewers with and without disabilities.

The National Association of Broadcasters (NAB) is requesting an additional six months for broadcast stations to come into compliance with the requirements to provide audible access to text crawls. We first want to be on record expressing our general frustration that, after literally years of advance notice, the broadcast industry seems not to have made every effort to ensure the safety of their viewers who are blind or visually impaired. We understand that broadcast stations are, in many ways, dependent upon third party vendors to help them achieve accessibility of emergency information. On the other hand, it seems to us that much more aggressive effort could have been made over these last four-and-one-half years since the signing of the CVAA to prepare for the on-time delivery of accessible emergency information, particularly since the

¹ National Association of Broadcasters, Petition for Temporary Partial Exemption and Limited Waiver, MB Docket No. 12-107 (filed Mar. 27, 2015) (“Petition”).

technological solutions for rendering text content audibly have been known for a very long time. That having been said, we can only trust the claims of broadcasters that their dependence on the cooperation of third party vendors makes them simply unable to comply with the current enforcement deadline. It is also our understanding that broadcasters are firmly committed to only seeking a one-time extension. If the Commission believes that broadcasters have made a sufficient case for such an extension, the Commission should make it clear that no further extensions in this area will be granted. Putting it another way, if allowing broadcast stations around the country an additional six months to come into compliance is the only thing that stands in the way of the nationwide reliability of accessible audible emergency information, then by all means, the Commission should eliminate this obstacle.

Regarding the question of whether audible emergency information made available to viewers with vision loss should include extensive content such as notice of school closures, our general position has always been that any and all information made available to viewers in text form should also be made available audibly. We continue to believe that this is sound and justifiable policy. It is obvious that the length of time that may be required to listen to all such content may far exceed the length of time it takes to scroll and/or visually read such content. Delivering all content audibly in those circumstances in which the content is particularly extensive may defeat the overall benefit of providing access to the most critical emergency information. Additionally, there may be practical alternatives, such as delivery of more extensive detailed emergency information via the Internet, to which viewers with vision loss may wish to turn rather than listening for an extended period of time for one very specific piece of information. These very practical concerns should be the subject of additional feedback from consumers, and we urge the Commission to suspend the specific requirement to make school closures audibly accessible for a period of no more than one year during which time the Commission will work with consumers to better assess needs and the most effective means for the delivery of extended detailed content, particularly school closures.

Finally, with respect to the rendering of inherently graphical information in audible form, such as a weather radar map, we appreciate that as of April, 2015, much more work must be undertaken to ensure that such graphical information can be made accessible through an automated solution. Clearly, such inherently graphical information can be verbally described in real time, but the challenge we are addressing here concerns delivering audible access to such graphical information in those instances where real-time verbal description is not possible. Finding an automated technological solution that consistently renders inherently graphical content in a reliable audible fashion is an ongoing challenge and will, once achieved, be of profound benefit to people with vision loss well beyond the context of emergency information. However, it should also be pointed out that it is far from conclusive, at least to us, that such graphical information provided without accompanying explanatory linear text is of much value to any viewer in the first place.

Therefore, we urge the Commission to make it clear that all emergency information delivered to the public must be provided in text format. Graphical emergency information should be permitted but only as a convenience for viewers with sight for whom such visual depiction of emergency information may be of additional but redundant value. We further urge that the Commission suspend any requirement that inherently graphical information be rendered audibly

for a period not to exceed eighteen months. During such time, further work can be done to develop reliable automated solutions, and should such solutions be satisfactory to consumers with vision loss, the Commission should then revisit this question. The Commission should expect that broadcasters play an active tangible role during this eighteen-month period to develop and/or assess possible solutions.

In summary, we are prepared to swallow an additional six months for compliance with the requirements to make textual emergency information audible provided that the Commission will not entertain any future petitions for such extensions. We urge the Commission to suspend for one year any expectation that school closure information be rendered audibly; during such period, consumer needs and preferences can be better assessed and practical alternatives evaluated. We urge the Commission to make it clear that no emergency information of any kind can be delivered to any viewer exclusively in graphical form; all emergency information for all viewers must be delivered in text form (regardless of whether it is also rendered graphically), bringing all such information within the requirements to make such text content audible. And we urge the Commission to revisit the question of the automated rendering of inherently graphical information in audible form in eighteen months to reassess the state of the art in such technological solutions.

Respectfully submitted by,
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