

Re: Docket number:
ET Dkt. No. 99-254

Closed Captioning Requirements for Digital Television Receivers

As you have learned from the National Association of the Deaf and the Consumer Action Network, the proposed standards for closed captioning for digital television are painfully inadequate. The minimum standards proposed are even less than current standards, and completely negate the technological advances of digital television -- contrary to all of the laws passed during the last twenty years of the twentieth century.

The ADA, Section 504, The Telecommunications Act, Section 255 -- all of these laws are designed to bring equal access to disabled people -- because we are your family, your friends, your neighbors, your co-workers. You know us. In these times it is almost impossible to find someone who hasn't been touched in some way by disability, or a disabling disease. Because you know us, you know that we deserve no less than you, yourselves.

One thing laws cannot do, though, is change people's attitudes. Laws can change how they behave, but not how they think. "Stigma" is a word not seen or heard much these days. But stigma exists. It's the pink elephant of the laws protecting the rights of disabled people. Let me tell you story to illustrate.

Back before closed captioning existed (which was not that long ago -- I'm only 46, but remember years of lipreading television, and badgering people to tell me what was said), PBS re-ran the 6 pm ABC nightly news at 11:30 pm with open captions. I was young, and not very interested in the news, but I saw this show every so often when something important was going on, and I wanted to have the same information as my parents and friends.

Later, when closed captioning became available, I bought a decoder as soon as I could afford it. I grew up hard of hearing, used hearing aids, was used to "assistive devices" and felt no stigma attached to captioning. I was thrilled to have the access.

My friend's grandmother, however, had a different experience. She was a hearing woman who had lost her hearing gradually with age. She watched the PBS re-run of the ABC news faithfully every night. But when closed captioning became available, she refused to use it. Even when her granddaughter bought her a decoder as a gift. Why? Stigma. Closed captions were for "...those poor deaf people who need it, not for me."

The world has changed drastically in the past twenty years, though. Now, people are used to seeing colored text on the screen. They are used to making color and font choices when they send their emails. They are used to seeing a variety of color and styles on Web sites when they go shopping, or looking for information or fun. Can you imagine the Web with just one font in one color?

Deaf and hard of hearing people embrace technology that improves their lives -- just as hearing people do. Now, though, instead of devices being "different" or "strange" there is a new commonality emerging, a converging of technology to satisfy needs, not disabilities. Text pagers, for example, are being used by both those who hear and those who can't. As the technology converges, the stigma begins to disappear. Technology is beginning to provide something the laws cannot -- a change in attitude.

I both want and need to be able to change the size of the caption and its placement on the screen (so that I can read what is currently being covered by captions). I want to pick the colors and fonts that make it easy for me to see the captions. I want to be able to chose captioning streams -- perhaps watch a show captioned in Spanish to learn that language. I want to be able to get emergency information because one of the data streams is reserved for that use. And I want to be able to travel, and know that watching captions in my hotel room will be not entail finding an owners manual for each captioning system. I fully support all of the comments submitted by the National Association of the Deaf (NAD) and the Consumer Action Network (CAN).

DIGITAL television makes that easy. But without the FCC leading the way with rules and guidelines that demand the best from producers, it won't happen.

Respectfully,

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