

BLINDED VETERANS ASSOCIATION

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March 23, 2000

Ms. Magalie Roman Salas, Esq.
Office of the Secretary
Federal Communications Commission
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RECEIVED

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Re: MM Docket No. 99-339

Dear Ms. Salas:

On behalf of the Blinded Veterans Association (BVA), the only Congressionally Chartered Veterans Service Organization exclusively dedicated to serving the needs of our nation's blinded veterans, I feel compelled to respond to comments submitted to the NPRM by the National Federation of the Blind (NFB). While some of their arguments opposing mandated video description are cogent, the apparent attempt to represent all people who are blind must be challenged.

Mandating the provision of this video description for people who are blind clearly falls within the purview of the Federal Communication Commission (FCC). It would not be necessary to mandate descriptive video if the producers of motion pictures and prime time television programming voluntarily implemented this service. Numerous attempts by the blind community to sensitize producers regarding the interest and need for described video and obtain a commitment to voluntarily provide description have failed. There is no recourse but to mandate these services.

With respect to the number of people who are blind or severely visually impaired who would be interested in having video description, no one organization can presume to speak for all the blind. Certainly there are blind individuals who may not care whether they have described video or not. However, there should be no requirement that 100% of people who are blind express strong interest in this service before approval or mandates can be enforced. While not all people who are blind may want descriptive video, there are certainly sufficient numbers that have a strong interest as well as a need for improved access to visual information. It is probably safe to say a majority of people who are blind would benefit from these services. This issue is too important to argue over numbers, resulting in inaction by the FCC.

BVA holds a National Convention annually and for the past number of years one evening is devoted to a movie night featuring a described movie hosted by WGBH, a Boston PBS station. This event is always well attended. BVA's members look forward to these movies each year. Additionally, BVA has adopted resolutions at conventions strongly supporting descriptive video.

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The time has come to move forward with the proposed rule and mandate the industry to begin providing described video programming. Clearly, the industry must address the real need for people who are blind to know what is being scrolled across the TV screen, especially when these involve safety issues. Other frustrations such as having sport scores shown on the screen without verbal description is another issue that certainly should be addressed. However, prime-time programming should have priority at this time in as much as the technology is already available. Although there will never be total unanimity within the blind community, we cannot allow differences to become major obstacles to improving access to visual information for people who are blind or visually impaired.

Respectfully,

A handwritten signature in black ink, appearing to read 'Thomas H. Miller', written over a horizontal line.

Thomas H. Miller
Executive Director
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