



**NATIONAL FEDERATION OF THE BLIND OF OHIO**

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Barbara Pierce, President

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FCC docket number 99-339

Mr. William Caton, Secretary, Federal Communications Commission

445 12th St., S.W.

Washington, D.C. 20554

Federal Communications Commission  
Office of Secretary

To: Members, Federal Communications Commission

I write to support the petition of the National Association of Broadcasters, the National Cable Telecommunications Association, and the Motion Picture Association of America. We urge the FCC to postpone implementation of its order to require fifty hours a quarter of described programming from the four TV networks. The original FCC decision was hasty and should be rethought. It would be unfortunate to impose this programming requirement on the networks beginning April 1 when the matter will be heard more fully next fall.

Please understand the distinction between what blind viewers need and what they want; between information and entertainment; between what is necessary for citizenship and what some people think would be nice to have. Blind people already watch television right now, without all the descriptions some are advocating. While it would be nice to know who fired the shot at the end of a program, I can usually find that out by waiting and listening a bit more. Described entertainment programming is not essential to holding down a job, maintaining safety, or being an informed citizen. Even if the networks provide some described programming, it cannot be the programs everybody in the blindness community watches—since we all have different interests—so many preferences will continue to be unmet. Even so, I daresay we will all survive and thrive without such description.

I can imagine enjoying described programming, if it were done the way I want it, but different blind people want differing amounts of information. At best what is supplied is someone's judgment of what can be presented in the silence available. This is very far from analogous to Closed Captioning for the deaf, in which the words spoken in the program are written across the screen. If and when described TV becomes a reality at any level, the can of worms will be opened for good because what some blind people must have to be happy will annoy others, and the producers will be in the middle, not satisfying anyone completely.

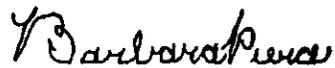
Compulsion is the issue here. Should the networks be forced to provide an undefined amount of description to a handful of programs? Those blind people who insist on their need for such additions will demand more and more. I believe that producers should be encouraged to try providing description as a public service. Together we can work out how to establish how much and where it should be done.

The NFB is not, however, taking the view that the networks should be required to do nothing to make their programming accessible to blind viewers. We believe that the weather crawls, speaker identification, and information text that now routinely appear on the screen

should also be sent from the character generator simultaneously by synthesized voice to the secondary audio channel. This is information that is never spoken and therefore is not available in any way to the blind watcher. It may be critically important in the case of weather crawls or a significant frustration in the case of phone numbers or other information necessary to know in order to respond to the subject of the programming. If the technical problems connected with providing this synthetic voice reading of the text material available to the sighted watcher are overcome, the cost for providing this service will be negligible, but producers will not take the time and trouble to provide it unless it is required. This is what the FCC should have insisted upon, not a few hours of entertainment description.

Please understand that this matter is fraught with disagreement in the blindness community and that the FCC should not act hastily.

Cordially,

A handwritten signature in cursive script that reads "Barbara Pierce".

Barbara Pierce