

# Coalition of Organizations for Accessible Technology

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March 26, 2008

Federal Communications Commission  
445 Twelfth Street, SW  
Washington, DC 20554

**In re: WC Docket 06-74**

**Comments of the Coalition of Organizations for Accessible Technology  
in Response to Report of “AT&T’s Efforts to Provide High Quality  
Service  
to its Customers with Disabilities” (December 21, 2007)**

Dear Commissioners:

The Coalition of Organizations for Accessible Technology (COAT)<sup>1</sup> is pleased that AT&T has filed its report describing its efforts to provide high quality service to its customers with disabilities. We are hopeful that AT&T, subsequent to its merger with BellSouth, remains committed to serving people with disabilities at a high level of customer service and responsibility and is willing to be held publicly accountable for its efforts. In these comments, we address two areas of AT&T’s services related to disability access: video programming and customer service.

## **Accessibility of Video Programming**

Since June 2007, AT&T states that it has worked to ensure that all of its television commercials have been closed captioned and that its new broadband television services, Uverse and Homezone, will provide closed captioning and SAP audio description on its commercial stations. COAT applauds AT&T for these efforts.

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<sup>1</sup> COAT is a coalition of over 175 national, regional, state, and community-based organizations that advocates for legislative and regulatory safeguards that will ensure full access by people with disabilities to evolving high speed broadband, wireless and other Internet protocol (IP) technologies. COAT is dedicated to making sure that as our nation migrates from legacy public switched-based telecommunications to more versatile and innovative IP-based and other communication technologies, people with disabilities will not be left behind. More information about COAT is available at <http://www.coataccess.org>.

We remain concerned, however, about the apparent failure of AT&T to pass through closed captioning and any available video description on certain community-based television channels, such as the Public, Educational and Government (PEG) channels. While we appreciate AT&T's interim measure to *open* caption all programs on these channels, we understand that no video description is yet able to pass through to viewers. Video description is the description of key visual elements in programming, inserted into natural pauses in the audio of programming. While video description is not yet a mandated service, it is in fact provided voluntarily by certain television channels, and offers the only means by which individuals who are blind or visually impaired can fully access television programming. Video description is also very important in providing critical details of emergency information.

The FCC's cable carriage rules require the carriage of features designed to make programming accessible to people with disabilities, including video description. Those rules state:

(g) Conditions of carriage. Content to be carried. A cable operator shall retransmit in its entirety the primary video, accompanying audio, and line 21 closed caption transmission of each qualified local noncommercial educational television station whose signal is carried on the cable system, and, to the extent technically feasible, program-related material carried in the vertical blanking interval, or on subcarriers, that may be necessary for receipt of programming by handicapped persons or for educational or language purposes. Retransmission of other material in the vertical blanking interval or on subcarriers shall be within the discretion of the cable operator.<sup>2</sup>

We urge the Commission to affirm the requirement to pass through all available accessibility modes – specifically closed captioning and video description – to ensure that all television viewers, including viewers with disabilities, have the access they need and have come to expect on all television channels, regardless of whether those channels are accessed via the Internet.

### **Customer Service**

COAT is further encouraged to have learned, through AT&T's report, that in 2008, the company promises to revise the "Methods and Procedures" used by all of its customer service representatives, so that these agents can achieve consistent best practices when serving customers with disabilities.

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<sup>2</sup> 47 U.S.C. §535(g)(1).

AT&T explains that this will direct representatives to provide customers with information about the company's various services, including the availability of assistive phone equipment, discounted tolls, 411 and directory assistance cost exemptions, the Lifeline discount program for low income persons, and billing in alternate formats. AT&T also asserts that it will develop a new training module for service representatives on disability-related matters, which will include information on how an individual's disabilities might impact a customer's use of telecommunications products and services, and how to provide appropriate support to customers with disabilities.

COAT appreciates these commitments and looks forward to their implementation. We are hopeful that these will serve as a model for other telecommunications companies to commit to making more public their efforts to advance and promote greater disability accessibility in products and services, as well as improved disability-related customer service efforts. We are also mindful of the recent public commitment to universal design made by AT&T to meet the wireless needs of customers with disabilities.<sup>3</sup>

However, COAT notes that customer service practices that are responsive to persons with disabilities, including the "Methods and Procedures" training proposed in 2008 for AT&T's customer service representatives, and the type of customer service support that AT&T is committing to provide, are *required* under Section 255 of the Communications Act and its implementing regulations (see 47 CFR §§ 6.11 and 7.11, rules effective January 2000).<sup>4</sup> In addition to complying with these

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<sup>3</sup> "AT&T Unveils Universal Design Approach to Help Developers Meet the Wireless Needs of Customers with Disabilities: *Wireless Leader Aims to Influence Industry-wide Change and Innovation in the Design of Wireless Products and Applications*," San Antonio, Texas, March 13, 2008, at <http://www.att.com/gen/press-room?pid=4800&cdvn=news&newsarticleid=25327>, last accessed March 13, 2008.

<sup>4</sup> 47 C.F.R. § 6.11, in relevant part, states:

(a) Manufacturers and service providers shall ensure access to information and documentation it provides to its customers, if readily achievable. Such information and documentation includes user guides, bills, installation guides for end-user installable devices, and product support communications, regarding both the product in general and the accessibility features of the product. Manufacturers shall take such other readily achievable steps as necessary including: (1) Providing a description of the accessibility and compatibility features of the product upon request, including, as needed, in alternate formats or alternate modes at no additional charge; (2) Providing end-user product documentation in alternate formats or alternate modes upon request at no additional charge; and (3) Ensuring usable customer support and technical support in the call centers and service centers which support their products at no additional charge . . .

(c) In developing, or incorporating existing training programs, manufacturers and service providers, shall consider the following topics: (1) Accessibility requirements of individuals with disabilities; (2) Means of communicating with individuals with disabilities; (3) Commonly used adaptive technology used with the manufacturer's

mandates, we would like to see a **commitment by AT&T** to disability sensitivity and awareness training, so that customer service agents are better able to respond to and address the needs of people with disabilities that have a particular service need. For example, all of these agents should be familiar with and be ready to convey to consumers the telephone number of AT&T's Section 255 contact so that they can refer callers to the office of this individual, when needed to address specific concerns.<sup>5</sup>

COAT also maintains that it would be beneficial for AT&T to report to the FCC the number of specific complaints and concerns related to disability matters that it receives annually, with a summary of the nature of these complaints and concerns, and the specific steps being taken by the company to address them. As the Commission is aware, millions of customers with disabilities have been affected by the merger of AT&T and BellSouth, and these individuals are justified in their expectations that they will receive both fully accessible services (where readily achievable), and a level of customer service by the merged company that will match those services.

Respectfully submitted,

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products; (4) Designing for accessibility; and (5) Solutions for accessibility and compatibility.

<sup>5</sup> Too often, COAT affiliate organizations learn of incidents involving AT&T customer service agents where individuals with disabilities are NOT referred to the AT&T office that specializes in disability-related services and that result in bad service or no service. Examples include improper disconnection of AT&T phone service of elderly and disabled persons and seeming ignorance of AT&T policies concerning service offerings or products developed for blind individuals or for individuals with hearing disabilities.

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On behalf of COAT

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