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FCC Mail Room

# Coalition of Organizations for Accessible Technology

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October 29, 2008  
VIA EMAIL & SNAIL MAIL

Chairman Kevin Martin  
Commissioner Jonathan S. Adelstein  
Commissioner Michael J. Copps  
Commissioner Robert M. McDowell  
Commissioner Deborah Taylor Tate  
Federal Communications Commission  
445 12th St. SW, 8<sup>th</sup> Floor  
Washington, DC 20554

**A Request for Implementation of Consumer Advisory Committee (CAC) Recommendation regarding Emergency Information in Video Programming for People Who Are Blind or Visually Impaired (RM-11499)**

Dear Chairman and Commissioners,

The Coalition of Organizations for Accessible Technology (COAT) is writing to respectfully request that the FCC implement, through its rule-making process, the recommendations of the Consumer Advisory Committee (CAC) that received formal adoption on June 27, 2008 regarding emergency information. The committee's recommendations are shown below.

COAT advocates for legislative and regulatory safeguards that will ensure full access by people with disabilities to evolving high speed broadband, wireless, digital and other Internet protocol (IP) technologies. COAT consists of over 220 national, regional, and community-based affiliates dedicated to making sure that as our nation migrates from legacy communications to more versatile and innovative IP-based and other communication technologies, people with disabilities will benefit like everyone else. COAT represents more than 31 million individuals with hearing loss, 10 million individuals who are blind or who have vision loss, and millions of individuals with other disabilities who benefit greatly from accessibility and usability of communications and information technologies.

Currently, FCC rules (47 CFR Part 79.2) on emergency programming require only an audio tone that alerts people who are blind or visually impaired of the need to access emergency information when emergency text is provided in video programming. Once the tone is heard, it is expected that such individuals will then turn to a second source (e.g., a radio) to obtain additional information about the emergency. This is not an effective means of providing emergency information to people who cannot physically view visual images on television.

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**Consumer Advisory Committee Recommendation  
Regarding Access to Televised Emergency Information  
By People Who Are Blind or Visually Impaired**

The Consumer Advisory Committee respectfully requests that the FCC take action to ensure that individuals who are blind or have low vision have access to televised emergency programming. To accomplish this, the FCC needs to identify methods to make such on-screen-displayed text -- which includes written or other non-verbal information (whether scrolled or displayed as characters or images) that appears on a television screen -- accessible to this population. Such text should include information provided

- during regular programming when such information is provided to afford viewers with warnings of and instructions on how to respond to emergency or hazardous conditions;
- during local and national news bulletins; and
- during the broadcasting of any other information the Commission deems appropriate.

COAT would like to work with the Commission on this critical issue to ensure that people who are blind or visually impaired receive emergency information in an accessible and timely manner. We look forward to hearing from you in the coming weeks to more formally discuss this subject.

On behalf of the Coalition,

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**American Association of People with Disabilities (AAPD)**

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Director of Public Policy  
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