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FCC Mail Room

October 30, 2008

Marlene Dortch, Secretary  
Federal Communications Commission  
445 12th St. SW, Room 8-B201  
Washington, DC 20554

**Regarding rulemaking #11499:  
ACB Petition on Accessibility of Televised Emergency Information**

Dear Secretary Dortch,

Please find an original and five copies of comments from the Carl and Ruth Shapiro Family National Center for Accessible Media at WGBH (NCAM) regarding the above-named petition.

Thank you.

Sincerely,

A handwritten signature in black ink, appearing to read "Larry Goldberg", is written over a horizontal line.

Larry Goldberg, Director  
Media Access Group at WGBH

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**Regarding rulemaking #11499:  
ACB Petition on Accessibility of Televised Emergency Information**

Dear Secretary Dortch,

On September 24, 2008, the American Council of the Blind requested that the FCC initiate a rulemaking to amend the rules regarding access to televised emergency information for people who are blind or visually impaired. The Carl and Ruth Shapiro Family National Center for Accessible Media at WGBH (NCAM) strongly supports the ACB petition.

NCAM is a research, development and outreach organization that works to make existing and emerging technologies accessible to all audiences and is part of the Media Access Group at WGBH, which also includes The Caption Center (est. 1972), and Descriptive Video Service® (est. 1990). Over the past 15 years, NCAM has developed accessibility guidelines, prototypes and commercial products for many technologies including CD-ROMs, DVDs, electronic program guides (EPGs), interactive multimedia, educational software, feature films and digital television. Our latest projects are developing access solutions for mobile devices, networked home media, emergency alert systems, e-books, in-flight entertainment and distance learning technologies.

In its petition, ACB identified a significant flaw in the existing emergency notification rules, that rules for "emergency programming only require an audio tone that alerts people who are blind or visually impaired of the need to access emergency information when emergency text is provided on televised programming." ACB states that, "This is not an effective means of providing emergency information to people who cannot physically view visual images on television."

The designated tone, in the rare occasions that it is actually utilized, clearly does not communicate enough information to help people who are blind or visually impaired escape hazards or find help during natural or man-made disasters. This issue provided the incentive for NCAM to request and receive a grant in 2005 from the U.S. Department of Education's National Institute for Disability Research and Rehabilitation.

The U.S. Department of Education (NIDRR) funded "**Access to Locally Televised On-Screen Information**" project (<http://ncam.wgbh.org/onscreen/>) has explored and developed prototype technology solutions that will enable local television stations to send messages, warnings and alerts that meet the communication needs of people with sensory disabilities. Project activities included:

- Creating metadata schemes for linking text with graphics, and for exporting text to speech synthesizers.
- Developing prototype software utilities that import data from various sources, then extract, transform and prepare it for prioritized text display or for speech output.
- Creating demonstration models within newsroom facilities of partner television stations.
- Publishing accessibility guidelines for local television stations which suggest implementation schemes for various equipment configurations, and provide recommendations for further study.

The results of these investigations are now available publicly and can be viewed online at the project's website:

<http://ncam.wgbh.org/onscreen/simulation.html>

As the project completes its work this year, software will be made available on the project Web site which will demonstrate automated transformation of on-screen text into audible speech which can then be transmitted to blind and visually impaired viewers via the SAP channel in analog TV or the ancillary audio channels in DTV. These options will be particularly useful for emergency information provided during regularly scheduled programs via an on-screen "crawl" of text at the bottom of the TV screen. During regularly scheduled news broadcasts or emergency bulletins, the automated functions can be used to supplement additional information spoken directly by a newscaster, or via other openly announced methods.

It is indeed crucial that, as ACB requests, "people who are blind or visually impaired receive emergency information in an accessible and timely manner." Technology and techniques exist that can achieve this goal with a minimum of intrusion on the budgets or production processes of TV stations and we urge the Commission to carefully examine these options.

Sincerely,



Larry Goldberg, Director  
Media Access Group at WGBH

Certificate of Service

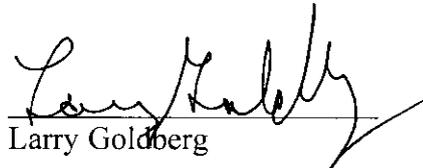
I hereby certify that on this 30<sup>th</sup> day of October, 2008, I caused a true and correct copy of the Reply to the American Council of the Blind's Petition in the Matter of Accessibility of Video Programming Providing Emergency Information for Individuals who are blind and visually impaired, to be mailed by first class U.S. mail, postage prepaid, to:

Eric Bridges

American Council of the Blind

1155 15<sup>th</sup> St., NW

Washington, DC 20005

  
Larry Goldberg