

**Before the  
Federal Communications Commission  
Washington, DC**

In the Matter of	)	
	)	
Development of Devices	)	MB Docket No. 08-172
Capable of Supporting	)	
Multiple Audio Entertainment Services	)	

**COMMENTS OF THE  
COALITION OF ORGANIZATIONS FOR ACCESSIBLE TECHNOLOGY**

**I. Introduction**

The Coalition of Organizations for Accessible Technology (COAT) is pleased to submit these reply comments in response to the Commission's Notice of Inquiry in the above-captioned proceeding.<sup>1</sup> COAT is a coalition of over 220 national, regional, state, and community-based disability 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, including all communications technologies, such as radio.<sup>2</sup>

Like any other consumer group, many of the over 50 million people with disabilities in the United States listen to radio for news, information, music and other entertainment. They listen to over-the-air broadcasts, they pay for radio programming in their cars, and they want the benefits of any new radio technologies, particularly if these offer a means of accessibility. Some people with disabilities, including blind persons, for instance, may rely more on radio, as an auditory form of communication, than even the general public. COAT, therefore, is very

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<sup>1</sup>*In the Matter of Development of Devices Capable of Supporting Multiple Audio Entertainment Services Applications*, MB Docket 08-172, rel. Aug. 25, 2008 [hereinafter "NPRM"].

<sup>2</sup> See at <http://www.coataccess.org>

interested in new forms of radio that would make radio more accessible to more people with disabilities.

COAT offers these comments on behalf of over 34 million individuals with hearing loss and many additional millions of individuals with cognitive or other disabilities who rely on captioning as part of their *television* viewing experience. COAT asserts that these consumers want the same access to the audio portion of whatever media they are tuned into, whether it is radio or television.

## **II. HD Radio Can Make Radio More Accessible For More People with Disabilities**

COAT applauds the work of National Public Radio (NPR) and its partners for advancing the opportunities for all consumers to access radio programming through text-based services and advanced radio reading services. Our understanding is that through the work of NPR Labs, NPR is now in the final year of a 3-year grant from the National Institute on Disability and Rehabilitation Research ("NIDRR") to examine ways of making radio more accessible to both the print-disabled and hearing-disabled communities. NPR works with various companies and manufacturers to enable stations to allocate a portion of the digital bitstream for the offering of radio reading services generally used by blind and other vision-disabled people. This same approach can allow print-impaired listeners to access radio reading services from the same HD receivers offered on a mass market basis to the general public.

COAT was delighted when, as part of this NIDRR grant, NPR developed live, over-the-air *captioned* radio during the past year. The first demonstration took place at the Consumer Electronics Show in Las Vegas in January 2008. Then, on Election Night 2008, NPR offered the first ever radio captioned election broadcast coverage to groups of "listeners" with hearing loss in five cities around the country via public radio HD stations. Through these premier broadcasts,

people with hearing loss were able to see the text of what hearing persons receive audibly over radio transmissions. NPR has indicated they intend to commence continuous captioning of their news programming by late 2009.<sup>3</sup>

COAT applauds this extraordinary work by NPR – which enables people who are deaf, hard of hearing, blind and low vision to fully experience radio technology – and as explained below, we urge the Commission to take the necessary steps to expand its availability to all Americans with hearing loss.

### **III. COAT Supports a Ubiquitous Requirement for Access Using HD Radio**

To make radio accessibility ubiquitous, COAT supports a requirement for HD functionality in any capable radios, including Satellite Digital Audio Radio Service (SDARS).<sup>4</sup> As the NPR project demonstrates, HD reception can provide important new services, specifically “accessible” radio services that provide significant benefits to people with disabilities.<sup>5</sup> COAT urges the Commission to take advantage of the current opportunity to provide such enhanced access as this nascent technology flourishes.

COAT believes the Commission has the necessary statutory authority to require the inclusion of HD functionality in SDARS receivers in order to ensure that accessibility will be everywhere. Specifically, the Commission may rely on the same statutory authority it used to authorize the SDARS service originally. The FCC may also use its general public interest authority to require inclusion of HD Radio technology in satellite receivers.

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<sup>3</sup> See Comments of National Public Radio, at 3-4 (filed November 10, 2008) (hereinafter “NPR Comments”).

<sup>4</sup> According to iBiquity Digital Corporation, the mandatory inclusion of HD chipsets in satellite receivers would have only a *de minimis* impact on the cost, design and functionality of this equipment. See Comments of iBiquity Digital Corporation, at 10 (filed November 10, 2008).

<sup>5</sup> See *NPRM* at ¶ 6 and NPR Comments at 8.

The NPR captioned radio demonstration points out the importance of how new HD technology can provide greater accessibility for vast numbers of Americans. Yet without a mandate from the Commission, it is likely that people with disabilities will wait a long time, if not forever, for HD Radio chipsets to be included in all receivers, including satellite radio receivers. Our history and experience shows that market forces have rarely, if ever, assured the specific inclusion of features that provide accessibility for people with disabilities.<sup>6</sup>

#### **IV. Conclusion**

We urge the Commission to mandate inclusion of HD Radio technology in satellite receivers to make the extraordinary services that this technology can offer to people with disabilities a reality.

Respectfully submitted,

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<sup>6</sup> The struggle to ensure closed captioning and decoder circuitry in TV sets demonstrates the problems with relying on market forces. Though the struggle for captioning began in the 1970s, it was not until 2006 that 100% of new, non-exempt television programming had to contain closed captions.

On behalf of the

**Coalition of Organizations for Accessible Technology**

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