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Ms. Marlene H. Dortch
Federal Communications Commission
445 12th Street S.W.
Washington, DC 20554

Re: *International Comparison and Consumer Survey Requirements in the Broadband Data Improvement Act, GN Docket No. 09-47; A National Broadband Plan for Our Future, GN Docket No. 09-51; Deployment of Advanced Telecommunications Capability to All Americans in a Reasonable and Timely Fashion and Possible Steps to Accelerate Such Deployment Pursuant to Section 706 of the Telecommunications Act, GN Docket No. 09-137*

Dear Ms. Dortch:

Verizon and Verizon Wireless¹ are committed to providing the greatest range of communication capabilities to all of our customers. Our mission is to provide the highest quality of service and sensitivity to our customers with disabilities by empowering them with accessible telecommunications products and services. Verizon provides the following responses to the follow-up questions from the October 20, 2009 National Broadband Plan Accessibility Workshop:

1. There was a lot of discussion at the roundtable about the concept of getting companies, independent software developers, consumers, government, and universities together to share best practices, understand consumer needs, and foster innovation. What are the next steps to establishing an innovation center or focus

¹ With the exception of Verizon Wireless, the Verizon companies participating in this filing are the regulated, wholly owned subsidiaries of Verizon Communications Inc. (“Verizon”).

center program? Are there some specific ideas on this and more information about models we can follow?

Verizon is committed to working collaboratively with independent software developers, federal, state and local lawmakers, colleges and universities and consumer and disability groups to share best practices, better understand the needs of consumers with disabilities and foster innovation.

For the past two years, Verizon has worked with the Coalition of Organizations for Accessible Technologies (COAT) to help shape the 21st Century Video and Communications Accessibility Act of 2009 (H.R. 3101) sponsored by Representative Markey. This collaboration has successfully balanced the interests of industry, while addressing the communications needs of aging Americans and persons with disabilities today and for years to come.

The Commission should promote similar cooperation by creating an ongoing forum to better understand the needs of the disability community and to highlight both consumer and industry concerns. Through sharing and collaboration, the needs of the disability community can be crystallized, and providers can learn how to address design issues and correct flaws. Just as Verizon has an Accessible Products and Services Committee to address these issues internally, creating a best practices forum with external participants would significantly enhance those efforts. Verizon would expect such a forum to attract widespread interest from engineers, marketers and sales staff and stimulate the marketplace with new and exciting products and services for customers with disabilities that will serve as building blocks for the next generation of innovators. Verizon would readily participate in such an effort and encourages the Commission to begin this process without undue delay.

4. The record contains a few examples of companies voluntarily making devices used for Internet access accessible to people with disabilities – in particular, the Apple I-Phone was mentioned several times at the workshop. What are some other examples of which we should be aware? What motivates companies to make their products accessible on a voluntary basis? Will companies consider accessibility issues in the design and development of their broadband products and devices on a widespread basis if there is no mandate to do so?

Verizon Wireless provides a wide range of innovative solutions and technologies that increase accessibility to its products and services by customers with disabilities. For example, the company supports Voice Commands and Menu readout on a majority of its devices. Voice Command provides customers the ability to navigate the handset and hear specific information, such as battery, signal strength, missed calls, time, and phone status. It also allows them to dial the phone by saying a name or number. In addition, the company offers TALKS for Verizon Wireless on certain handsets, which converts displayed text on a mobile handset into highly intelligible speech. TALKS for Verizon Wireless has audio feedback for writing and reading text messages, emails, and notes, allowing blind and low-vision users to take advantage of most features available on a

handset, including contact directories, caller ID, and the internet. For deaf and hard of hearing customers, Verizon Wireless offers text-only calling plans.

Verizon Wireless additionally offers a number of handsets that can be used by people with disabilities. The recently released Motorola Droid has a specific accessibility setting on the device that provides for text to speech. The phone will read all menus and sub menus; the name or number being dialed (it echoes what is selected); all text messages and letters being composed; all text messages in the inbox or that were sent and still on the device; and the name of an application that is selected. Another handset, the Knack, employs a “large font” easy-to use-menu and dialing keypad. The Knack also has voice commands and dedicated colored keys for ease of use and navigation. Verizon Wireless further offers 28 handsets and 13 smartphones that are hearing aid compatible. Verizon Wireless’ digital network and handsets that accept a 2.5 mm plug-in also support TTY devices.

Finally, Verizon Wireless offers customers with disabilities a number of innovative ways to learn about Verizon Wireless’ services. For example, the company offers information about its Nationwide Messaging plans in online videos in American Sign Language. Free 411 assistance is provided to all customers who are blind, have low vision, a dexterity disability, or a cognitive disability, or whose disability significantly inhibits their ability to read a phone directory, dial a phone number, read a 411 text message response to an inquiry, or remember a phone number. Bills, product and service brochures, and some handset manuals also are available in Braille and large print formats as well as on a 3.5 diskette or a CD-ROM. Verizon Wireless provides a link to an online newsletter prepared by Verizon called Forward Access, which addresses the unique needs and interests of consumers with disabilities. Forward Access serves as a community Internet resource for all types of important information for people with disabilities, including calendar listings, special offers, original articles, timely reprints or excerpts from publications, pertinent news, and opportunities to question industry experts.

Verizon offers similar assistance to customers with disabilities. Verizon operates a Center for Customers with Disabilities (VCCD) to address questions raised by customers with disabilities. The VCCD is staffed with representatives that have received training on disabilities so that customers can communicate with Verizon. The VCCD representative will discuss with the customer his or her particular needs and recommend the services that would best meet those needs. For example, deaf customers that use videophones require Internet access service with speeds fast enough for use with a videophone. Verizon also provides bills in Braille or large print and online bills that are accessible by screenreaders for blind and low vision customers.

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As discussed above, Verizon and Verizon Wireless take seriously the needs of their customers with disabilities and are constantly seeking ways to improve their products and services to better serve them. We support the FCC acting as a convener for best-practice sharing sessions. A collaborative strategy has been successful for Verizon

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and could prove to be successful for the industry as a whole. Verizon is prepared to participate and contribute to this effort. Thank you so much for the opportunity to respond to your questions.

Sincerely,

A handwritten signature in black ink that reads "Kathryn C. Brown". The signature is written in a cursive style with a long horizontal flourish extending to the right.

Kathryn C. Brown
Sr. Vice President
Public Policy Development & Corporate Responsibility

cc: Ms. Elizabeth Lyle
Policy Advisor, Broadband Team