

Comments Provided by Marcie Roth

Senior Advisor, Disability Issues
Department of Homeland Security/ FEMA
202.212.1537 (office)
500 C. Street SW
Washington, DC 20472
marcie.roth@dhs.gov

There is a need for FCC rulemaking as it pertains to real time text. Real time text is critical for first responders to assist when an individual can't speak or when their speech is difficult to understand. This includes individuals with speech and communication disabilities as well as individuals whose communication is compromised due to the emergency. With real time text, an individual can type "having a heart at" or "trappe" without pressing the "send" button and the first responders will receive the text message as it is being typed.

In every aspect of the planning for interoperability in the national Broadband Initiative, it is imperative to consider the needs of diverse communities, including citizens and emergency responders with disabilities. There are legal requirements that alerts and warnings are accessible to all who may need them, and this will be best achieved by fully complying with the requirements for accessibility at the front end rather than attempting to retrofit systems that were not designed to meet the needs of the whole community at the outset.

The FCC has done a great job engaging all stakeholders, including people with disabilities, who will benefit from access to broadband to increase personal and community safety.

FCC needs to issue technical guidance to help all to take advantage of broadband as a powerful tool for public safety (preparedness, alerts and warning, response and recovery) and insure access for all including citizens and public safety workers with disabilities.

FCC could issue guidance to agencies on priority use of broadband by people with disabilities during emergencies with continued use of social media for emergency prep, and response, need technical guidance on making this tool accessible for use by all including people with disabilities.