



public efforts to improve accessibility; and (3) workshops and field events to share and discuss technological breakthroughs that promote accessibility.

AT&T strongly supports Recommendation 9.9 of the National Broadband Plan and the Commission's efforts to implement that recommendation. AT&T also applauds the Commission for its efforts to reach out to the disability community and to insure that it incorporates into the development of the Accessibility and Innovation Forum the needs and ideas of those persons challenged by accessibility on a day to day basis. In all aspects of the Accessibility and Innovation Forum, the Commission should focus on educating and meeting the needs of persons with disabilities. As the Commission has recognized, this takes not only online efforts, but also, and often more importantly, face to face interaction.

## **Discussion**

### **Accessibility Clearinghouse**

AT&T supports the creation of an Accessibility Clearinghouse. Despite the existence of blogs, search engines, and other internet spaces designed to gather data, it remains a challenge for persons with disabilities to efficiently and effectively find information about products and services that might improve their accessibility. While some companies, such as AT&T, provide information related to accessibility, there is no central location where all of this information is available. A clearinghouse for consumers, vendors and government representatives to interact on accessibility issues (the "Accessibility Clearinghouse"), as proposed by the Commission, would be a major step in the right direction to resolve this problem.

This Accessibility Clearinghouse could provide a forum for vendors that offer products and services which are beneficial to persons with disabilities to share information about those products and services. Vendors can provide links to their website where consumers can educate themselves about products or services, such as a product or service description, consumer reviews, training and support materials, and frequently asked questions. It may also provide an opportunity for consumers to learn about product and service offerings that might address other disability related needs. Relying on links to vendor websites, rather than inputting vendor product and service offerings onto the Accessibility Clearinghouse page, will help ensure that the information remains current.

The information on the Accessibility Clearinghouse should be easily accessible and navigation of the site intuitive. A separate web page could be created for different disabilities. For example, information about products and services that improve accessibility for deaf and hearing impaired consumers should be available from a single web page dedicated to that disability. That web page could also contain links to other disability related information that might be of interest to consumers challenged by that disability.

Given the fast pace of application development, the Commission may want to investigate ways to enable large and small applications developers to share information regarding the accessibility of their applications as well as to seek collaboration and input from the disability community. The Accessibility Clearinghouse could host information from users with disabilities as well.

The Accessibility Clearinghouse should contain a “search” function that allows consumers to seek information about a particular product, service, or vendor. Vendors could be listed on a general page for “vendors” and on those pages that pertain to the categories of disability assisted by a particular product or service. For example, a page for hearing aid compatibility (“HAC”) might contain links to the websites of wireless providers and device manufacturers listing their HAC compliant devices, whereas a page for telecommunications relay service (“TRS”) might contain links to TRS providers’ websites. The “search” function should also allow information to be segregated by disability.

Consumers should also be allowed to rate products or services which provide features that address disability specific issues. If evaluations of products and services take the form of commentary, the Commission should monitor the site to insure that all comments, including those that may be deemed negative about a certain product or service, remain respectful of other users of the Accessibility Clearinghouse, and remove any comments that use profanity or other inappropriate content. Vendors should also be provided a voluntary opportunity to respond to the consumer’s inquiry in a manner that provides full transparency for consumers. However, complaints or inquiries made by consumers on the Accessibility Clearinghouse should neither be considered informal complaints nor used as a replacement of the Commission’s informal complaint resolution process.<sup>3</sup> To the extent that any solicitation of ratings or comments from consumers

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<sup>3</sup> To resolve consumer privacy concerns, any solicitation of complaints from consumers should clearly disclose that consumers may utilize the Commission’s informal complaint process or contact vendors directly without disclosing personal information on-line.

requests CAPTCHAs<sup>4</sup>, the Commission should consult with the disability community to overcome the challenges of understanding and inputting CAPTCHAs or to identify other options to provide comment. For example, blind consumers may have difficulty understanding CAPTCHAs provided verbally and consumers who are both blind and deaf may not be able to access the CAPTCHA at all.

The Commission must be cautious to ensure that the Accessibility Clearinghouse does not give consumers the perception that it is validating positive or negative claims about products or services made by consumers and that it does not favor one vendor over another. For example, under no circumstances should the Accessibility Clearinghouse recommend a product, service, or vendor, or provide a Commission sanctioned rating of any product, service, or vendor. Consumers, not the Commission, are in the best position to determine the products, services, and vendors that best meet their needs, and the Accessibility Clearinghouse should be used solely to aid those consumers in reaching this conclusion for themselves through a review of the facts. The Accessibility Clearinghouse should contain a “Suggestion Box” link that would allow consumers to express concerns or recommendations about the site itself, including proposals for improvement.

### **Accessibility Blog**

AT&T supports the idea of establishing a blog to highlight best practices, accessibility announcements, and ongoing efforts in industry; standards groups; international fora; government; academia; the disability community; and in other fora and venues. AT&T also supports the idea of soliciting "guest bloggers" from outside the Commission to blog about these efforts. However, AT&T encourages the Commission to

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<sup>4</sup> A CAPTCHA or Captcha is a type of [challenge-response](#) test used in [computing](#) to ensure that the response is not generated by a computer. It typically requires the respondent to enter a code provided on the website that is soliciting the response.

concentrate on facts and potential developments in its blog. Very often, blogs become an avenue for one interest group or another to trumpet their position on a particular issue, rather than concentrate on the best interests of the disabled community. If that is allowed, these persons or entities will “hijack” the blogs, to the detriment of individuals with disabilities.

### **Workshops and Field Events**

AT&T encourages the Commission to engage in as many workshops and field events as is possible. All of the other ideas in the Accessibility and Innovation Forum for educating customers—the Accessibility Clearinghouse and an Accessibility Blog—will have only marginal value if they are not promoted and the benefits explained to members of the disability community. Further, persons with disabilities cannot easily access communications technologies until they know those technologies exist. For some, that may only occur at a workshop or field event.

The Commission should reach out through different venues and in different parts of the country. Workshops and field events should be held in areas other than the Northeast or in and around Washington, DC. The Commission can hold and sponsor workshops and also participate in conferences held by consumer organizations, such as disability groups or those addressing the needs of older Americans. At all of these workshops, the Commission should be willing to discuss different aspects of accessibility and ways to address the functional limitations often associated with aging. The workshops could also be used to discuss rulemakings and the need for public comment in the Commission's rulemaking efforts.

## Conclusion

In these comments, AT&T provides the Commission with recommendations to enhance the Accessibility and Innovation Forum that will help educate consumers with disabilities on products and services that might improve their accessibility to modern day communications and technologies. AT&T also encourages the Commission to work closely with the disability community to determine the best way to improve accessibility.

For the foregoing reasons, AT&T urges the Commission to consider this submission.

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Respectfully submitted,



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