

Dear FCC Representative:

In submitting this response to your July 19th, Federal Register Notice seeking Public Comment on Accessible Mobile Phone Options for People who are Blind, Deaf-blind, or Have Low Vision, I believe it critical to note that I am totally blind, having lost all usable vision in 1980. My experience with cell phones and, Service providers over the past 30 years has been as an individual with a visual disability. My comments will focus on the accessibility features found on most cell phones and, the financial constraints faced by blind/low vision individuals whose income is routinely less than the average, non-disabled individual.

It has been my experience that initially none and, now fourteen years after passage of the Telecommunications Act (1996), Chapter 255, few cell phones offer any accessibility features essential for blind/low vision access, such as screen magnification, screen color/contrast adjustments, tactile controls or synthetic speech for screen reading, out of the box. Quite often, the necessary Assistive Technology (AT) has functional issues with certain models of cell phones, limiting the free choice of a device by blind/low vision users of this technology. If these features are available for the phone, it is often an additional expense to the blind/low vision consumer, costing several hundred dollars above the cost of the initial handset.

These additional cost routinely prohibit consideration of cell phone services by low income blind/low vision consumers who must absorb these expenses to use this device. In the few instances there is basic accessibility, full access to the other cell phone features, i.e. texting, calendar, address book, etc. remain inaccessible. This inaccessibility prohibits the blind/low vision consumer from fully utilizing these features to efficiently manage their activities of daily life.

If, the cell phone is a tool critical for employment, Such an inaccessible business phone puts the user with a visual disability at a distinct disadvantage over coworkers with complete access to the cell phone. Since it is the exception when AT is a cell phone component or, can be installed by the Service Provider as a component-off-the-shelf (COTS) employers are wary to provide the accommodation as its utility to the blind/low vision employee is generally an unknown quantity and, customarily cost prohibitive. Presently, the cell phone used personally and, for business has the essential AT required by me for effective communications to family, friends, colleagues and clients. The cost of the AT on this phone totaled nearly \$700 plus the cost of Annual Service Contracts to insure this software is maintained and updated at regular intervals.

It has also been my experience when attempting to arrange cell phone services for a blind/low vision client whose, income is, at best, marginal, options for a pay-as-you-go or low to mid-range priced cell phone with necessary AT are few, if totally non-existent. When available these options must be purchased with more expensive, high-end phones which, quite often, offer plans with far higher Monthly Usage Fees or Annual plans..

Basic accessible cell phones are virtually non-existent.

Cell phone service providers often have well-meaning staff at retail stores or managing help lines but, these individuals have very little information about what cell phone models have accessibility features available, and how these are used. Documentation, if it exists, is often in a PDF format that is not completely accessible, and rarely available in large print or Braille.

With the dramatic increase in cell phone texting, and the importance of this communication media for both personal and business use, few cellphones offer accessible number pads or keyboards, making this feature often inaccessible as well.. It has been my experience personally and, with clients served that, in most cases, this shortcoming can be remedied by the use of tactile on the cell phone keys or, a tactile designation of a specific key as a "centering" point for the blind/low vision user. In this way, once the center point is identified, the blind/low vision individual could easily orient themselves to the keypad and, this familiarity would become secondary with regular use.

It is my understanding that Section 255 of the Telecommunications act of 1996 mandates that, manufacturers must make certain that their products are "designed, developed, and fabricated to be accessible to and usable by individuals with disabilities" when this is readily achievable to do so. I further understand that the FCC is responsible for rules and policies to enforce the law. It is clear that Section 255, after 14 years, requires better regulated rules and policies, and stricter enforcement, to achieve these goals.

Thank you for considering these comments,

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