

Before the Federal Communications Commission
445 12th Street, SW
Washington DC 20554.

CG Docket No. 10-145
Accessible Mobile Phone Options for People Who Are Blind, Deaf-Blind, or Have Low Vision

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The Federal Communications Commission (FCC) has asked for comments concerning access to mobile technology for blind, low vision, and the deaf-blind. I am a totally blind person and over the last 12 years I have used a wide range of cell phones, served as a beta tester for several assistive technology companies, and provided training to companies and individuals on those technologies. My comments will be limited to only experiences of blind cell phone users.

First, it is important to point out that of major cell phone companies only AT&T, Verizon and Sprint (to some extent) have made strong efforts to provide accessible cell phones to the blind. Other providers such as TMobile and all pre-paid companies such as Trakphone have no accessibility efforts.

A blind user can make a phone accessible, but only if the phone has third-party software available for it such as Nuance Talks or Mobile Speak from Code Factory. Human Ware has also made a screen reader for the Blackberry called Orator. The cost of this third-party software ranges from \$295 to \$495 and could be as high as \$795 if a blind person also wishes to purchase the GPS application for Mobile Speak software for their phone. In addition, in the case of Mobile Speak the phone is only accessible running Windows Mobile 6 or 6.5. The new Windows Phone 7 is not accessible at all.

Between Nuance Talks, Mobile Speak, and Orator most feature phones and smart phones are accessible, but in the case of AT&T they hinder the accessibility, more on that in a moment. Verizon has recently become the first wireless service provider to make a low point of entry into cell phones for the blind with the release of the Haven. This phone costs for \$39 with a two year contract and is widely praised by its users for making all functions accessible. This phone uses the Nuance Talks technology to power the voice output. For other carriers you have to purchase the phone and then buy a third-party application as mentioned above. AT&T attempts to make this less expensive, but fails in this area..

AT&T sells through its disability center a license for Mobile Speak from Code Factory. Mobile Speak works on a wide range of smart phones and feature phones, but AT&T only offers a very limited selection of two phones to its customers who contact the disability center. So if a customer sees that Mobile Speak works with the HP Ipaq Glisten on the Code Factory website and purchases that phone from AT&T and then tries to purchase Mobile Speak from the AT&T disability center they are told AT&T and by extension Code Factory does not support the HP phone in question. When pushed on the issue AT&T admitted that it tests the Mobile Speak software to ensure it will work on their phones. Even though the Mobile Speak developers have already done that for them. This causes further problems for a blind person as they now have to purchase the software at full price.

I support the free market and would prefer that the FCC allow the market to work out the details as much as possible, but I would like to recommend a baseline from which the blind and deaf-blind community can begin.

1. The FCC should mandate that a cell phone service provider display on its website and provide to customer service representatives as well as to store employees a listing of accessibility features present on the phone and the name of any third-party software that enhances the accessibility of the phone such as Nuance Talks, Mobile Speak, or Orator.
2. Cell phone manufacturers and wireless service providers should be encouraged to follow Verizon's lead with the Haven and provide phones similar to the Haven at the basic and feature phone level.
3. Pre-paid cell phone companies should be required to provide a fully accessible cell phone again using the Haven as the model or face serious fines and penalties from the FCC. It should take a pre-paid phone company no longer than six months to bring a phone to market that is accessible now that Verizon has done most of the hard work with Samsung.
4. A wireless service provider such as AT&T who offers to provide a third-party screen reader for their cell phones should not be able to limit the offer to a select set of phones, but instead should offer the discount for all phones, as long as the phone is supported on the companies network.

I thank the FCC for considering these comments.

Sincerely,

Reagan D. Lynch