

Dear FCC,

I wish to comment on the limitations to accessibility features I have used on cell phones.

Since acquiring my first cell phone in the late 1990s I have owned four cell phones. As a blind consumer I have had varying levels of success in accessing the features of the phones. While cell phone access for blind consumers has improved considerably in the past decade or so, several elements of accessibility are still lacking. My comments are based on my experiences alone, and they are not intended to describe the existing state of affairs throughout the mobile phone industry.

I have found it difficult to obtain and read manuals for my cell phones in a format that is understandable to blind consumers. While manuals seem to be available for most phones, obtaining the desired manual is often an exercise in frustration that involves navigating through a confusing series of web pages on the cell phone manufacturer's web site which may or may not lead the user to a link to download the manual for the user's particular model of phone.

Once the manual is downloaded it is likely to be in the form of a .PDF file which may or may not be readable by screen reading software. Even if the blind person can read the manual it may be written in such a way that it makes no sense for a blind user. For example, the manual may contain a diagram of the phone's keypad which the blind user can't understand. Then, the instructions for the phone's various functions may indicate the desired keys to press, not by stating the text name for the key, such as "send", "menu" or "cancel", but instead displaying a graphic representation of the keys in question which cannot be read by the blind phone user, thus making the instructions in the manual unintelligible for the blind user.

The software that is sold with the phone, allowing such functions as downloading ring tones and software and synchronizing the phone's address book, calendar, etc with a PC-based personal organizer, such as Microsoft Outlook, may be inaccessible to blind computer users' screen reading software, thus greatly limiting the functionality of the phone.

Even if the phone includes screen reading software or some other voice prompt functionality, this functionality may only work with the phone's menu system and with a limited number of its built-in applications, thus preventing the user from using certain features that are available to the general public.

The number of accessible cell phone models is small, and cell phone retailers often lack sufficient knowledge of such products to provide the blind consumer with sufficient product information to permit the consumer to make a well-informed buying decision.

I understand that laws such as Section 255 of the Telecommunications Act and other legislation

mandate cell phone accessibility. However, in many respects, the cell phone industry has failed to achieve the intent, and perhaps also the minimum requirements of these laws.

Thank you,  
Frank Welte