

May 27, 2011

The Honorable Julius Genachowski
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

RE: WT Docket No. 11-65

Dear Chairman Genachowski:

The American Foundation for the Blind (AFB) is pleased to submit these comments regarding the merger of AT&T and T-Mobile. We believe that T-Mobile customers with vision loss will benefit from this merger.

AT&T, through its merger with Cingular Wireless, was the first wireless service provider to subsidize access software for consumers with vision loss. This enabled consumers with vision loss to take advantage of innovative wireless communication technology using highly effective specialized software. Unfortunately, T-Mobile customers with vision loss have not experienced that kind of support and assistance from their service provider. AT&T has indicated that it is now preparing a strategy to support full access to phones using the Android operating system by supporting software developed by Code Factory. We are not aware of any such plans by T-Mobile.

AT&T has a strong record of support for and interest in the needs of the disability community. AT&T has established advisory committees (on which AFB has been represented) to gather input and has provided significant staff support for these committees. As a result, AT&T has included the needs and interests of consumers with disabilities in its efforts to bring innovation to telecommunications technology. These efforts have ranged from the support for access software, the introduction of phones meeting the needs of seniors – the Breeze and Ease products – and even such efforts as “smart shoes” communications to monitor compromises in a person’s balance. AFB is hopeful that once the merger is complete, AT&T’s support for persons with disabilities will carry over to existing T-Mobile customers.

We understand that AT&T will be able to significantly expand and improve the 4G LTE network through this merger. This advanced network will enable people with

vision loss to realize improvements in communication and independence through advancements in mobile technologies. Access to a faster, more efficient, and more robust network will, we believe, allow for the introduction of more useful applications for communication and interaction as well as, provision of specialized information and navigation.

In reviewing this proposed merger, AFB urges the FCC to consider AT&T's long and storied history of assisting the disability community, its track record of invention of innovation for the benefit of the disability community, and the unique opportunity AT&T has to expand its reach by merging with T-Mobile.

Sincerely,

Paul W. Schroeder
Vice President, Programs & Policy
American Foundation for the Blind

CC:
Commissioner Meredith Attwell Baker
Commissioner Mignon Clyburn
Commissioner Michael J. Copps
Commissioner Robert M. McDowell