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December 13, 2012

Ms. Marlene Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: CG Docket No. 10-145 (Implementation of the Twenty-First Communications Video Accessibility Act ("CVAA"))

Dear Ms. Dortch:

On December 11, 2012, Paula Boyd, Director of Governmental and Regulatory Affairs at Microsoft Corporation and the undersigned met with Karen Peltz Strauss, Deputy Bureau Chief, Consumer and Governmental Affairs Bureau ("CGB"); Gregory Hlibok, Chief, Disability Rights Office, CGB; Eliot Greenwald and Rosalind Crawford with the Disability Rights Office, CGB, to discuss Commission implementation of Section 718 of the CVAA. Specifically, the parties discussed the scope of the statute, emphasizing its application only to telephones such as smartphones. We also discussed the nature of the responsibilities of browser providers, and explained that requires the core functions of the browser to be accessible but does not extend to the content retrieved on the Internet. Lastly, we urged the Commission to follow the same approach that it took in the context of the advanced communications services proceeding under the CVAA and to take a functional approach to its smartphone browser rules which will give the industry flexibility in complying with the rules.

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Please direct any questions to the undersigned.

Sincerely,

A handwritten signature in black ink, appearing to read "G. Waldron". The signature is fluid and cursive, with the first letter of the last name being a large, prominent "W".

Gerard J. Waldron

cc: Ms. K. Peltz Strauss
Mr. G. Hlibok
Mr. E. Greenwald
Ms. R. Crawford