

**Before the
Federal Communications Commission
Washington, DC 20054**

In the Matter of)
)
Accessible Emergency Information, and)
Apparatus Requirements for Emergency) MB Docket No. 12-107
Information and Video Description:)
Implementation of the Twenty-First)
Century Communications and Video)
Accessibility Act of 2010)

REPLY COMMENTS OF AT&T

AT&T Services, Inc. (“AT&T”) files these Reply Comments in response to the Notice of Proposed Rulemaking (“*Notice*”) released by the Federal Communications Commission (the “Commission”) to implement Sections 202(g) and 203(a) of the Twenty-First Century Communications and Video Accessibility Act of 2010¹ (the “CVAA”).²

AT&T agrees with the comments of the Consumer Electronics Association (“CEA”),³ the Entertainment Software Association,⁴ and the Telecommunications Industry Association

¹ Twenty-First Century Communications and Video Accessibility Act, S.3304 (P.L. 111-260) (2010), as amended by S. 3828 (P.L. 111-265) (2010) (“21st Century Accessibility Act”).

² Accessible Emergency Information, and Apparatus Requirements for Emergency Information and Video Description: Implementation of the Twenty-First Century Communications and Video Accessibility Act of 2010, MB Docket No. 12-107, *Notice of Proposed Rulemaking* (rel. Nov. 19, 2012) (“*Notice*”).

³ Comments of the Consumer Electronics Association, MB Docket No. 12-107, at 4-5 (Dec. 18, 2012).

⁴ Comments of the Entertainment Software Association, MB Docket No. 12-107, at 3-5 (Dec. 18, 2012).

(“TIA”)⁵ that the Commission’s emergency information rules apply to television broadcast services and multichannel video programming distributors (“MVPDs”) services only, not to IP-delivered video programming that is not otherwise an MVPD service.⁶ As the Commission has observed, the video description rules require video description only by television broadcast stations and MVPDs. They do not apply to over-the-top IP-delivered video. Congress used definitions from these television-based video description rules to explain the emergency information requirements—imposing the obligation to provide accessible emergency information upon video programming providers, video programming distributors, and programming owners—because it intended for the emergency information requirement to likewise apply only to television broadcast stations and MVPD services. Congress further conveyed its intention to limit the emergency information rules in this manner by not explicitly authorizing the application of the rules to all IP-delivered video programming,⁷ in direct contrast to the directive from Congress in Section 202(b) to make closed-captioning available on video programming delivered over IP. Consequently, AT&T supports the Commission’s conclusion that the emergency information rules do not apply to all IP-delivered video programming.⁸

⁵ Comments of the Telecommunications Industry Association, MB Docket No. 12-107, at 5-6 (Dec. 18, 2012).

⁶ Although, as observed in the *Notice*, AT&T’s U-Verse service is an IPTV service, it is also an MVPD service, and thus would be covered by the Commission’s emergency information rules.

⁷ *Notice* at ¶6.

⁸ *Id.*

Dated: January 7, 2013

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Robert Vitanza", with a long horizontal flourish extending to the right.

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