



Comcast Corporation
300 New Jersey Avenue, NW
Suite 700
Washington, DC 20001

February 19, 2013

Via Electronic Filing

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street SW
Washington, DC 20554

Re: 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

Dear Ms. Dortch,

On February 14, 2013, Jerry Parkins, Ryan G. Wallach, Thomas Wlodkowski, and the undersigned of Comcast Corporation (“Comcast”), and Jonathan Friedman and Daniel K. Alvarez of Willkie Farr & Gallagher LLP met via conference call with Steven Broeckaert, Michelle Carey, Maria Mullarkey, Mary Beth Murphy, Alison Neplokh, Jeffrey Neumann, and Diana Sokolow of the Media Bureau, and Eliot Greenwald, John Herzog, and Karen Peltz Strauss of the Consumer & Governmental Affairs Bureau, regarding Comcast’s accessibility efforts and the Commission’s implementation of the accessible emergency information requirements of the Twenty-First Century Communications and Video Accessibility Act of 2010 (“CVAA”).¹

We noted that Comcast already has taken an active role in the implementation of the CVAA by serving in various leadership roles in and providing experience and expertise to the Video Programming Accessibility Advisory Committee (“VPAAC”). We also discussed specific initiatives that Comcast has undertaken to increase awareness of accessibility issues within the company, to improve accessibility to customer care, and to improve accessibility with respect to Comcast video services. For example, we noted that Comcast has initiated training for product development teams to consider accessibility issues as early in the product development cycle as possible.

¹ See *In re 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, Notice of Proposed Rulemaking*, 27 FCC Rcd 14728 (2012) (“*Emergency Information NPRM*”).

We expressed Comcast's support for the Commission's proposal to make emergency information accessible to individuals who are blind or visually impaired by requiring multichannel video programming distributors ("MVPDs") to pass through emergency information that is provided by broadcasters in the secondary audio stream. We also expressed support for the proposal, as set forth in the *Emergency Information NPRM*, that the rules should apply "to television broadcast services and MVPD services, but not to IP-delivered video programming that is not otherwise an MVPD service."² We noted that Comcast today passes through the secondary audio stream for all its cable services and supports access to secondary audio in its set-top boxes.

In response to questions from the FCC representatives on the call, we noted that Comcast today offers "MVPD services," in both QAM and IP, as well as a wide range of non-MVPD over-the-top Internet video programming via its XfinityTV.com website and associated apps for iOS and Android devices. In particular, Comcast currently offers several linear programming networks via XfinityTV.com and thousands of video-on-demand titles via XfinityTV.com and associated apps, and authenticates users accessing video programming via partners' websites and apps. We also explained that Comcast works with all of its partners and vendors to enable accessibility features with our video services, and we are working with our partners and through various industry-wide and standard-settings organizations to improve the accessibility features available to our customers.

Please direct any questions to the undersigned.

Respectfully submitted,

/s/ James R. Coltharp

James R. Coltharp

² *Emergency Information NPRM* ¶ 6.