

Before the  
**FEDERAL COMMUNICATIONS COMMISSION**  
Washington, D.C. 20554

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

**COMMENTS OF  
THE CONSUMER ELECTRONICS ASSOCIATION  
ON  
FURTHER NOTICE OF PROPOSED RULEMAKING**

**CONSUMER ELECTRONICS  
ASSOCIATION**

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**I. INTRODUCTION AND SUMMARY**

The Consumer Electronics Association (“CEA”)<sup>1</sup> hereby responds to the above-captioned Further Notice of Proposed Rulemaking (“*FNPRM*”), which the Commission released in conjunction with its Report and Order (“*Order*”).<sup>2</sup> The *Order* implemented accessibility requirements for emergency information provided in video programming and required certain apparatus to be capable of delivering emergency information and video description to individuals who are blind or visually impaired.

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<sup>1</sup> CEA is the principal U.S. trade association of the consumer electronics and information technologies industries. CEA’s more than 2,000 member companies lead the consumer electronics industry in the development, manufacturing and distribution of audio, video, mobile electronics, communications, information technology, multimedia and accessory products, as well as related services, that are sold through consumer channels. Ranging from giant multinational corporations to specialty niche companies, CEA members cumulatively generate more than \$209 billion in annual factory sales and employ tens of thousands of people.

<sup>2</sup> See *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*, Report and Order and Further Notice of Proposed Rulemaking, 28 FCC Rcd 4871 (2013). CEA refers to ¶¶ 1-79 of the foregoing item as the *Order* and ¶¶ 80-86 as the *FNPRM*.

CEA applauds the Commission's efforts in the *Order* to craft focused and reasonable emergency information and video description rules consistent with Sections 202 and 203 of the Twenty-First Century Communications and Video Accessibility Act of 2010 ("CVAA").<sup>3</sup> CEA appreciates the importance of making emergency information and video description available to individuals with disabilities, consistent with the CVAA. CEA and its member companies are committed to working with the Commission and individuals with disabilities to facilitate increased access to emergency information and video-described programming.

CEA urges the Commission to use restraint in considering the small set of issues raised in the *FNPRM*. These issues are less closely related to the CVAA than the issues resolved in the *Order*. The *Order* is more than sufficient to implement the relevant provisions of the CVAA and to realize Congressional intent in this area.

The CVAA does not extend emergency information or video description requirements to tablets, laptops, personal computers, smartphones, or similar devices ("mobile and other devices") through which consumers access linear programming via Internet Protocol ("IP") or other nontraditional means, and consequently the Commission must refrain from subjecting these devices to emergency information and video description requirements. However, if new regulations are adopted, a phase-in period of at least two years is essential. Moreover, if a new technical standard is needed to ensure interoperability for these services on mobile devices and networks, the implementation deadline should be based on adoption of the standard, which could take longer than two years.

The Commission should permit industry to address tagging of the secondary audio stream as a standards matter and not mandate tagging at this time. Finally, rather than adopting rules

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<sup>3</sup> Pub. L. No. 111-260, §§ 202-03, 124 Stat. 2751, 2767-73 (2010) (to be codified at 47 U.S.C. §§ 613(g), 303(u), (z)).

governing customer support services to assist customers who are blind or visually impaired with navigating between the main and secondary audio streams, the Commission should first monitor how companies actually provide such support before adopting rules governing this area.

## **II. MOBILE AND OTHER DEVICES THAT RECEIVE LINEAR PROGRAMMING VIA INTERNET PROTOCOL SHOULD NOT BE SUBJECT TO THE EMERGENCY INFORMATION OR VIDEO DESCRIPTION REQUIREMENTS**

### **A. Manufacturers of these Devices should not be Subject to Emergency Information Requirements**

The Commission should not extend the apparatus emergency information rules to mobile and other devices that are not designed to receive, play back, or record video programming transmitted via television broadcasts or multichannel video programming distributor (“MVPD”) services. Although the *FNPRM* asks about placing obligations on manufacturers of such devices,<sup>4</sup> the apparatus rules for emergency information must be consistent with the CVAA both to stay within the Commission’s jurisdiction and to “avoid placing undue and unnecessary burdens on industry.”<sup>5</sup>

Section 203 of the CVAA limits the scope of the apparatus rules for emergency information to a narrow class of devices – those that make available the type of video programming that is subject to the Commission’s existing emergency information rules. Section 203 amended the Communications Act of 1934 (the “Act”) by adding new Section 303(u)(1)(C) to the Act. Section 303(u)(1)(C) directs the Commission to require that, if technically feasible, apparatus designed to receive or play back video programming transmitted simultaneously with sound have the capability to decode and make available, to individuals who are blind or visually

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<sup>4</sup> See *FNPRM*, 28 FCC Rcd at 4927, ¶ 81.

<sup>5</sup> *Order*, 28 FCC Rcd at 4914-15, ¶ 61 & n.254.

impaired, “emergency information” as defined in Section 79.2 of the Commission’s rules.<sup>6</sup> Section 79.2 imposes obligations on “video programming distributors,” which, in turn, Section 79.1 of the rules defines to be television broadcast stations, MVPDs, and “any other distributor of video programming for residential reception that delivers such programming directly to the home” and is subject to the Commission’s jurisdiction.<sup>7</sup> The Commission consistently has applied Sections 79.1 and 79.2 only in the context of traditional broadcast television and MVPD services, which are classic examples of services for residential reception that deliver such programming directly to the home.<sup>8</sup>

There is no basis in the CVAA or in Commission precedent for the Commission to extend its regulations in this area to the mobile and other devices mentioned in the *FNPRM*. Recognizing the current scope of Section 79.2, the *Order* properly declined “at this time to adopt rules to encompass apparatus that are not designed to receive, play back, or record video programming provided by entities subject to our existing emergency information and video description rules.”<sup>9</sup> The Commission should proceed with this approach.

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<sup>6</sup> CVAA § 203(a) (codified at 47 U.S.C. § 303(u)(1)(C)).

<sup>7</sup> 47 C.F.R. § 79.1(a)(2).

<sup>8</sup> See *Closed Captioning of Internet Protocol-Delivered Video Programming: Implementation of the Twenty-First Century Communications and Video Accessibility Act of 2010*, Report and Order, 27 FCC Rcd 787, 795-96, ¶ 11 & n.54 (2012) (“*IP Captioning Order*”) (stating that Section 79.1 covers **television broadcasts and “traditional managed video services”** that MVPDs provide); see also *id.* at 796, n.64 (“By ‘traditional managed video service,’ we mean a **service though which an MVPD offers multiple channels of video programming**” (emphasis added)). See also *Reminder Regarding Video Programming Distributors’ Obligation To Make Emergency Information Accessible To Persons With Hearing Or Vision Disabilities*, Public Notice, 26 FCC Rcd 8550, 8550 (2011) (describing “broadcasters, cable operators, satellite television services, and ‘any other distributor of video programming [for example, over fiber] for residential reception that delivers such programming directly to the home’” as being subject to Section 79.2).

<sup>9</sup> *Order*, 28 FCC Rcd at 4914-4915, ¶ 61.

In particular, the mobile and other devices addressed in the *FNPRM* — tablets, laptops, personal computers, smartphones, and similar devices — are not the types of devices contemplated by the CVAA or the Commission as being “for residential reception” for delivery of linear programming “directly to the home” as required by Section 79.1 and, thus, by reference, Section 79.2. In fact, the Commission first adopted the rules in Section 79.2 concerning the accessibility of emergency information in rulemaking proceedings that focused exclusively on broadcasting and MVPD service.<sup>10</sup> The Commission designed those rules to supplement its television closed captioning and video description rules, which apply to traditional broadcasting and MVPD service.<sup>11</sup>

This limitation on the scope of video programming subject to Section 303(u)(1)(C) of the Act contrasts with the broader scope of video programming subject to closed captioning requirements in Section 303(u)(1)(A) of the Act, also added by Section 203 of the CVAA. Section 303(u)(1)(A) directs the Commission to require that, if technically feasible, certain apparatus “be equipped with built-in closed caption decoder circuitry or capability designed to

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<sup>10</sup> See *Closed Captioning and Video Description of Video Programming et al.*, Second Report and Order, 15 FCC Rcd 6615 (2000) (“*Second Closed Captioning Order*”) (adopting Section 79.2 of the rules, pursuant to Section 713 of the Act, to require that emergency information be made accessible to persons with hearing disabilities); *Implementation of Video Description of Video Programming*, Report and Order, 15 FCC Rcd 15230 (2000) (“*2000 Video Description Order*”) (adopting video description rules for television programming and amending Section 79.2 of the rules to require emergency information to be made accessible to people with visual disabilities, citing Section 713 of the Act); see also Section 713 of the Act, 47 U.S.C. § 613 (1996) (directing the Commission to issue closed captioning regulations and to commence an inquiry to examine the use of video descriptions on video programming).

<sup>11</sup> See *Second Closed Captioning Order*, 15 FCC Rcd at 6618, ¶¶ 7-8 (adopting Section 79.2 and noting the concern that, under the television closed captioning rules in Section 79.1, emergency information would be subject to the same closed captioning requirements as other new programming); see also *2000 Video Description Order*, 15 FCC Rcd at 15250, ¶ 49 (amending Section 79.2 to address the accessibility of emergency information to persons with disabilities and noting that aurally describing emergency information in the main audio “would be similar to providing ‘open’ video description”).

display closed-captioned video programming,”<sup>12</sup> **without** the limiting reference in Section 303(u)(1)(C) to rules that apply to traditional broadcast television and MVPD services.<sup>13</sup>

The Commission has acknowledged that “Congress did not explicitly extend the scope of the emergency information rules to IP-delivered video programming.”<sup>14</sup> To the extent that mobile and other devices interact with video delivered via IP, they are not subject to the CVAA’s emergency information requirements, and the Commission should not mandate rules regarding the secondary audio channel. Likewise, the CVAA’s apparatus provisions do not apply to mobile and other devices that can receive, play back, or record video programming only via a browser or another means of accessing such content on a website.

The apparatus requirements now apply to mobile DTV apparatus but do not apply to mobile and other devices that do not include receivers used to access television broadcast or MVPD services.<sup>15</sup> Mobile DTV apparatus access services and programming that are covered by Section 203 of the CVAA and Section 79.2 of the Commission’s rules. Especially given its limited jurisdiction in this area, the Commission should observe the consumer experience with Mobile DTV transmissions and devices before moving to create emergency information rules for mobile and other devices.

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<sup>12</sup> 47 U.S.C. § 303(u)(1)(A).

<sup>13</sup> The CVAA defines the term “video programming” to mean “programming by, or generally considered comparable to programming provided by a television broadcast station, but not including consumer-generated media.” 47 U.S.C. § 613(h)(2).

<sup>14</sup> *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, 14734, ¶ 6 (2012) (“*Emergency Information/Video Description NPRM*”).

<sup>15</sup> *See Order*, 28 FCC Rcd at 4913, n.249.

**B. Manufacturers of these Devices Should Not be Subject to Video Description Requirements**

For similar reasons, the Commission should not extend the apparatus video description rules to mobile and other devices that are not designed to receive, play back, or record video programming transmitted via television broadcasts or MVPD services.<sup>16</sup> The *FNPRM* asks about placing video description obligations on manufacturers of these devices.<sup>17</sup> However, Section 303(u)(1)(B) of the Act, added by Section 203 of the CVAA, limits the apparatus rules for video description only to devices that make available video programming transmitted in a manner subject to the Commission’s existing video description rules, “reinstated and modified pursuant to [Section 713(f) of the Act].”<sup>18</sup> Those rules apply only to broadcast television and traditional MVPD services.<sup>19</sup>

The Commission is not authorized to extend the video description apparatus rules beyond devices that receive video programming via television broadcasts or traditional MVPD service. With regard to video description, Section 203 is limited to the decoding and delivery of video

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<sup>16</sup> *See id.*, 28 FCC Rcd at 4914-15, ¶ 61 & n.254 (recognizing that the scope of the apparatus rules for video description should be consistent with the limited scope of the reinstated video description rules for programming to “avoid placing undue and unnecessary burdens on industry”).

<sup>17</sup> *See FNPRM*, 28 FCC Rcd at 4927-4928, ¶ 83.

<sup>18</sup> *See* CVAA § 203(a) (codified at 47 U.S.C. § 303(u)(1)(B)).

<sup>19</sup> *See* 47 C.F.R. § 79.3. Section 202 of the CVAA, which amends Section 713(f) of the Act to reinstate the video description rules, “appl[ies] to video programming . . . insofar as [such] programming is transmitted for display on television in digital format.” CVAA § 202(a); *see also* 2000 *Video Description Order*, 15 FCC Rcd at 15231, ¶ 1, 15238-42, ¶¶ 19-28 (imposing video description rules on certain broadcast stations and MVPDs “to make television more accessible to persons with visual disabilities”); *Video Description: Implementation of the Twenty-First Century Communications and Video Accessibility Act of 2010*, Report and Order, 26 FCC Rcd 11847, 11853, n.43 (2011) (“2011 *Video Description Order*”) (“Given that the rules Congress instructed us to reinstate are limited to the provision of video description on television, the reach of broadcast stations and nonbroadcast networks over the Internet is not addressed in this proceeding.”).

description services provided with traditional broadcast and MVPD video programming pursuant to the Commission's reinstated video description rules.<sup>20</sup> This limitation contrasts with the broader scope of Section 303(u)(1)(A), which directs the Commission to adopt closed captioning rules for apparatus designed to receive or play back video programming,<sup>21</sup> including video programming delivered via IP.

To the extent that mobile and other devices addressed by the *FNPRM* interact with video delivered via IP, they are not subject to the video description requirements in Section 203 of the CVAA, and the Commission should not mandate such rules for apparatus regarding the secondary audio channel.<sup>22</sup> Thus, apparatus rules for video description should not apply to any mobile or other device that can receive, play back, or record video programming only via a browser or another means of accessing such content on an Internet website.<sup>23</sup>

As the *Order* notes, at this time, the apparatus requirements do not apply to mobile devices that do not include receivers used to access television broadcast or MVPD services, although they do apply to mobile DTV apparatus.<sup>24</sup> Unlike mobile devices without DTV receivers, mobile DTV apparatus access services and programming that is covered by the reinstated video description rules and subject to Section 203. As with emergency information requirements, the Commission should observe the consumer experience with Mobile DTV transmissions and devices before creating video description rules for mobile and other devices.

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<sup>20</sup> See 47 U.S.C. § 303(u)(1)(B); see *2011 Video Description Order*, 26 FCC Rcd at 11853, n.43.

<sup>21</sup> See 47 U.S.C. § 303(u)(1)(A).

<sup>22</sup> See *id.*; 47 C.F.R. § 79.3.

<sup>23</sup> See *Emergency Information/Video Description NPRM*, 27 FCC Rcd at 14734, ¶6 (stating that “the CVAA directs that the Commission’s video description regulations ‘shall apply to video programming ... insofar as such programming is transmitted for display on television in digital format’”).

<sup>24</sup> See *Order*, 28 FCC at 4913, n. 249.

**C. If New Regulations Are Adopted, A Phase-In Period of At Least Two Years Is Essential**

If, contrary to the discussion above, the Commission were to decide to impose emergency information or video description requirements on manufacturers of mobile and other devices, a compliance period of at least two years from the date of Federal Register publication of such requirements would be essential. Moreover, if a new technical standard is needed to ensure interoperability for these services on mobile devices and networks, the implementation deadline needs to be based on adoption of the standard, which could take longer than two years.

To comply with the new requirements, manufacturers of these devices would need to incorporate into their offerings new functionalities that they have not previously had to accommodate. This would require a sufficient amount of testing to ensure that the newly covered devices operate in accordance with Commission regulations in an area where implementation can be challenging. Such a phase-in period for compliance would provide the time needed for conducting preparations to achieve full compliance with the new accessibility requirements. In addition, a two-year phase-in period would be consistent with phase-in periods that the Commission has adopted in other CVAA-related proceedings.<sup>25</sup>

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<sup>25</sup> See *IP Captioning Order*, 27 FCC Rcd at 859, ¶ 122 (two-year phase-in period); *Implementation of Sections 716 and 717 of the Communications Act of 1934, as Enacted by the Twenty-First Century Communications and Video Accessibility Act of 2010*, Report and Order and Further Notice of Proposed Rulemaking, 26 FCC Rcd 14557, 14601-03 ¶¶ 107-10 (2011) (“*ACS Order*”) (two-year phase-in period).

**D. Consistent with the Commission’s Implementation of the CVAA to Date, Manufacturers Should Not Be Responsible for Third-Party Software That They Do Not Control**

If the Commission were to extend the emergency information and video description apparatus rules to mobile and similar devices, then, consistent with the *IP Captioning Order*<sup>26</sup> and the *ACS Order*,<sup>27</sup> manufacturers of these devices cannot be held responsible for the accessibility of video programming applications developed by third parties that the manufacturers do not install or cause to be installed in their devices. The Commission already has carefully defined the extent to which manufacturers are responsible for the accessibility of software that they pre-install on their devices, and the Commission should not expand upon that for digital apparatus or navigation devices in this context.<sup>28</sup>

Section 203 of the CVAA applies only to certain “apparatus,”<sup>29</sup> and the use of that term limits the scope of the provision to physical devices, including software bundled with such devices at the time of sale. As stated in the *IP Captioning Order*, the term “apparatus” does not include “third-party software that is downloaded or otherwise added to the device independently by the consumer after sale and that is not required by the manufacturer to enable the device to play video.”<sup>30</sup> Similarly, if the Commission were to impose accessibility obligations on

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<sup>26</sup> *IP Captioning Order*, 27 FCC Rcd at 841, ¶ 94 (“We decline to include within the scope of our interpretation of the statutory term ‘apparatus’ third-party software that is downloaded or otherwise added to the device independently by the consumer after sale and that is not required by the manufacturer to enable the device to play video.” (footnote omitted)).

<sup>27</sup> *ACS Order*, 26 FCC Rcd at 14564, ¶ 13 (“[T]here is no liability for a manufacturer of end user equipment for the accessibility of software that is independently selected and installed by the user, or that the user chooses to use in the cloud.”); *see also Order*, 28 FCC Rcd at 4915, ¶ 62 (“[W]e interpret the term ‘apparatus’ to include . . . physical devices . . . , as well as software integrated in those covered devices.” (footnote omitted)).

<sup>28</sup> *See ACS Order*, 26 FCC Rcd at 14585, ¶¶ 68-69, 14588, ¶ 79 (2011).

<sup>29</sup> CVAA § 203(a), (b) (codified at 47 U.S.C. § 303(u), (z)).

<sup>30</sup> *IP Captioning Order*, 27 FCC Rcd at 841, ¶ 94.

applications providers concerning the provision of emergency information or video description, the Commission should refrain from holding device manufacturers responsible for applications and software not under their control, including those independently downloaded by end users.

### **III. THE COMMISSION SHOULD NOT MANDATE TAGGING OF THE SECONDARY AUDIO STREAM AT THIS TIME**

At present, the Commission should not require the use of a particular tag, such as “Visually Impaired” or “VI,” in the video description stream.<sup>31</sup> As explained in the record gathered earlier in this proceeding, even if broadcasters and MVPDs were required to use VI tags in signaling for video description, due to technical limitations in commonly used legacy equipment, many consumers would not be able to locate and select a tagged audio stream.<sup>32</sup>

As the Commission recognizes, these are “very technical matters,”<sup>33</sup> involving the transition of legacy broadcast, distribution and reception equipment and processes to properly signal video descriptions in accordance with ATSC standards. The Commission should not attempt to mandate a tagging approach as this effort is underway among industry stakeholders. Premature Commission rules in this area would likely have unintended negative consequences for consumers and hamper the ability of industry experts to devise solutions that will benefit the greatest number of consumers in the shortest time possible. Accordingly, CEA urges the Commission not to impose tagging rules at this time.

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<sup>31</sup> See *FNPRM*, 28 FCC Rcd at 4928-4929, ¶ 85.

<sup>32</sup> See, e.g., National Association of Broadcasters (“NAB”) Comments, MB Docket No. 12-107 (filed Dec. 7, 2012) at 17.

<sup>33</sup> *FNPRM*, 28 FCC Rcd at 4928, ¶ 85.

#### IV. THE COMMISSION SHOULD MONITOR THE EFFICACY OF CUSTOMER SUPPORT SERVICES BEFORE ADOPTING RULES

Before the Commission attempts to regulate customer support services as presented in the *FNPRM*,<sup>34</sup> covered entities should have the opportunity to integrate customer support services for video description and emergency information into their other customer care operations, including their operations mandated by other rules. In the *Order*, the Commission wisely chose not to impose specific requirements for customer support services on entities subject to the new rules, although it stated that “manufacturers’ and MVPDs’ customer service representatives should be able to answer consumer questions about accessing the secondary audio stream with respect to the devices each supports” and encouraged “covered entities to provide a point of contact, as well as other information about how to seek assistance, on their websites and in other informational materials distributed to the public.”<sup>35</sup> CEA and its members are well aware of the Commission’s expectations in this area.

Rather than mandating a specific set of requirements for customer support, the Commission should permit covered entities to implement their own versions of customer support services to reflect the rules adopted in the *Order* as well as the other rules that the Commission has adopted pursuant to the CVAA. There is no indication that covered entities will not adequately be able to assist customers who are blind or visually impaired with navigating between the main and secondary audio streams. Because CEA’s members approach customer support in a wide variety of ways, they should be permitted to address support issues in as flexible a manner as possible. The Commission should monitor whether any issues develop with

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<sup>34</sup> *See id.* at 4929 ¶ 86.

<sup>35</sup> *Order*, 28 FCC Rcd at 4910-4911, ¶ 54.

customer service before mandating the type of customer support services that covered entities must provide.

**V. CONCLUSION**

The *Order* is more than sufficient to implement the relevant provisions of the CVAA regarding emergency information and video description and to realize Congressional intent in this area. CEA urges the Commission to proceed cautiously in considering the issues raised by the *FNPRM*, as detailed above.

Respectfully submitted,

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