



Community. Art. Culture.

Northampton Community Television
www.northamptontv.org
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July 30, 2013

Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: In the Matter of Accessibility of User Interfaces, and Video Programming Guides and Menus, MB
Docket No. 12-108, Notice of Proposed Rulemaking (FCC 13-77)

Dear Commissioners:

Northampton Community Television submits this letter in the above-referenced rulemaking proceeding (NPRM) in support of the comments filed by the Alliance for Community Media; the Alliance for Communications Democracy; Montgomery County, Maryland; and the National Association of Counties, National Association of Telecommunications Officers and Advisors & U.S. Conference of Mayors.

Northampton Community Television is a community media center in Northampton, MA. We manage three cable channels and two web sites in the municipality that provide government transparency, community events, cultural activities, education, creative works, resources, space, and news to its citizens. We run a citizen journalism and community storytelling project called Paradise City Press. In 2012 we trained 114 people in skills like camera operation, audio, lighting, editing, photography, writing, and special effects. During that time our community generated 630 original local productions and posted 167 stories on our citizen journalism platform. We had 1817 check outs of NCTV resources. We conducted classes for high school students, hosted 30 interns, providing some of their first professional experience in the field, held youth filmmaking workshops and youth web media workshops. We host free outdoor film screenings for the community that help raise money for local athletics programs. We bring professional Hollywood camera operators to share their experiences to our members. We are providing grant opportunities for local artists to create multimedia work. We serve content via cable television to 10,000 households, have 1400 Facebook followers, and get 8000 hits a day on our web site, and 1000 people watch our videos online each week. We are currently beta testing a project that will provide coverage of all government committees to the residents they serve.

We are a vibrant asset that is well utilized by and that serves our community well. We are a valued resource. And one of our most consistent complaints is the inability of viewers to understand what is on

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our channels via an on-screen program guide. Such a program guide is also the only source for information about potentially closed captioned programming. Such closed captioned programming includes NASA, Soldiers Radio and Television, and Democracy Now!. Captioning programming can be an expensive endeavor, and our facility is exempted via hardship clauses from mandated captioning. However captioning remains a priority for us and we will begin implementing it before the end of 2013. Our efforts will remain unrewarded and our community will remain unserved if the cable provider is not required to pass along captioning information, listed in specific program information in their onscreen interactive program guides.

We have program descriptions and accessibility information readily available for our programs with accessibility options such as closed captions. However, currently, Comcast's program guide lists only a generic label of what our channel is, and no details regarding specific programs, despite our ability to deliver this information in detail to them. This level of information is inadequate to meet the accessibility goals of the Twenty-First Century Communications and Video Accessibility Act of 2010.

We have regularly requested that Comcast provide this service to the citizens of our community, but they have refused. Viewers cannot determine from the MVPD's video programming guide what our programs are and whether our programs are accessible. Thus, viewers with visual or auditory disabilities cannot make meaningful video program choices.

We urge the Commission to adopt rules that would require video programming guides and menus which display channel and program information include, for all channels, high level channel and program descriptions and titles, as well as a symbol identifying the programs with accessibility options (captioning and video description).

Thank you for the opportunity to submit these comments.

Urgently,

P. Al Williams
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