



METHUEN COMMUNITY TELEVISION
13 BRANCH STREET
METHUEN, MA 01844

August 1, 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:

Methuen Community Television of Methuen, Massachusetts 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.

Methuen Community Television is a non-profit corporation providing a public access channel and production facilities to government officials, educators and residents of our city. In our last two fiscal years, we have helped create over 1500 hours of local original programming. This programming includes high school sports, concerts and educational shows on various topics. We also led the way by creating election forums which covered state-level elections in 2012. Our newsmagazine, Methuen Now! just celebrated its 10th anniversary of providing positive stories about our community. Our programming is available to about 15,000 households in Methuen, MA.

Our Commission on Disabilities advocates for all devices which can help people in our community participate in society. Though we are not currently carrying closed captioned programming, we do know that there are people in our community who do use the service. When we have such programs, we want our audiences to know about it. The onscreen video programming guide of our multichannel video programming distributors (MVPD), Comcast and Verizon do not provide a label or symbol indicating that anything we air has closed captions.

We have program descriptions and accessibility information readily available for our programs with accessibility options such as closed captions. However, currently, Comcast and Verizon just label us as "Local Programming" with no way to let people know what we have available for them.

This level of information is inadequate to meet the accessibility goals of the Twenty-First Century Communications and Video Accessibility Act of 2010 (CVAA). 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 for all channels. This includes a high level channel and program descriptions with titles, as well as a symbol identifying the programs with accessibility options (captioning and video description). Our citizens who struggle with visual or aural disabilities are missing out on the opportunity to choose local options which might enrich their lives.

Thank you for the opportunity to submit these comments.

Karen L. Hayden

Methuen Community Television, Methuen, MA

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