



**ALLEN COUNTY PUBLIC LIBRARY**

900 Library Plaza • Fort Wayne, IN • 46802 • Jeffrey R. Krull, Director

Access Fort Wayne

August 2, 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:

Access Fort Wayne 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.

Access Fort Wayne is a department of the Allen County Public Library and operates two (2) public and one (1) government access channels for Allen County. Our operation began in January of 1981 when cable was first introduced to Allen County and the community had spent several years beforehand as PEG access was the most important desire for the community. We currently provide 300 hours of programming per week for our community, from various city meetings to programming in Spanish and Burmese languages. Access Fort Wayne's programming is available to over 100,000 subscribers on Comcast Cablevision and Frontier Cable in Allen County Indiana.

We carry 120 programs on our channel(s) of which 20 are closed-captioned each week, some of which are Democracy Now, Recovery Network and Armed Services programming that are closed-captioned. We carry programming such as City Council Meetings, which includes closed captioning on our channel(s) and is invaluable to inform the community. The onscreen video programming guide of our multichannel video programming distributor Comcast



**ALLEN COUNTY PUBLIC LIBRARY**

900 Library Plaza • Fort Wayne, IN • 46802 • Jeffrey R. Krull, Director

Cablevision and Frontier, does not provide a label or symbol indicating that these programs have 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 Frontier does not provide the specific on screen information that any of our programming is closed-captioned. Viewers are only given the most basic information such as “public access programming. 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 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.

Erik Möllberg  
Assistant Manager  
Access Fort Wayne  
900 Library Plaza  
Fort Wayne, IN 46802