



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:

Falmouth Community Television (FCTV) 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.

Falmouth Community Television is an independent, non-profit organization that provides the community and people of Falmouth, Massachusetts with access to information technology and training in its use so that individuals and groups have a forum to communicate their ideas, information and concerns to the community at large via one of three channels (public, education or government). In 2012 on our three local channels we cablecast over 20,000 hours of programming including 453 hours of first run (premier) programming. Our programming is available to approximately 17,000 cable subscriber households via Comcast in Falmouth, MA.

Our Town Meeting coverage includes a sign language interpreter appears and is critical to our audience.

The onscreen video programming guide of our multichannel video programming distributor (MVPD), Comcast, does not provide a label or symbol indicating whether any program has closed captions.

We are able to make program descriptions and accessibility information readily available for our programs with accessibility options such as closed captions. However, currently Comcast does not specify what programs are on when or what accessibility is available. The words *local programming*, *public access*, *government access* or *educational access* or *No Programming details* currently is all that appears on program guides. 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.

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