

**Telecommunications Commission – GHS-TV
City of Germantown TN**

August 3, 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:

The City of Germantown Telecommunications Commission 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.

GHS-TV offers more than 740 hours per month of quality programming over Cable Channel 17.

- GHS-TV's unique Access Together Project serves the larger community needs through co-production of a wide variety of original public access series and special event programs.
- Serving as the local production facility for the City of Germantown, GHS-TV produces public service announcements, promotional tapes and television spots for a variety of community clubs and organizations.
- GHS-TV offers live cablecast coverage of all major City Hall meetings and special events.
- GHS-TV prepares and produces orientation, promotional and training tapes used by Shelby County Schools and other governmental agencies.
- Located on the campus of Germantown High School, the GHS-TV television production program serves more than 300 students in eight introductory and four advanced classes. Students receive training on state of the art quality video equipment which enables them to qualify for outstanding college and university programs.
- GHS-TV's advanced production students produce a large variety of educational and informational programs that are cablecast to the entire community.
- Special needs programming is made available to the community:

- Youth Leadership Conference
- Rotary Club
- Senior Crime Stoppers
- Other service organization tapings

Our programming is available to over 11,000 subscribers in Germantown, TN.

We carry the programs which includes closed captioning on our channel(s). The onscreen video programming guide of our multichannel video programming distributor (MVPD), Comcast or ATT, 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 ATT only list all shows as Public/Education/Government. This level of information is inadequate to meet the accessibility goals of the Twenty-First Century Communications and Video Accessibility Act of 2010 (CVAA). We have asked that the channel guide be individualized for the programs that we provide. Comcast has refused our request stating it would cost somewhere between \$15,000 and \$100,000. They have never come up with a definite number when pressed. 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.

Our community is also served by AT&T's U-verse multichannel video service, which has created unique and especially difficult problems for visually-impaired viewers wishing to view PEG channel programming that are discussed in the comments filed by the Alliance for Communications Democracy, the Alliance for Community Media, and Chicago Access Corporation (CAN TV). Unlike the linear PEG channels on our incumbent cable operator's system, which the visually impaired can reach simply by remembering the right channel number 17, with AT&T's PEG product the visually impaired must somehow, after punching in channel 99, figure out how to visually navigate a series of menus and sub-menus just to reach any of our PEG channels. The more PEG channels in the DMA and the more PEG channels in each jurisdiction, the more sub-menus the visually impaired must somehow figure out how to "see" and navigate. In short, the visually impaired are genuinely, and dramatically, disadvantaged compared to the non-visually impaired in accessing, and being able to have the same functionality with respect to, our PEG channels on AT&T's U-verse system.

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.

Sincerely yours,

Kenneth P. Ketcham

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