



WCCA TV 13 “The People’s Channel” 415 Main Street, Worcester MA 01608

July 26, 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:

WCCA TV 13 ( Worcester Community Cable , Inc.) of 415 Main Street, Worcester MA 01608, 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.

WCCA TV 13 is a 501 (c)(3) Charitable organizations that provides and facilitates public access television community media center with programs presented on cable and the web . In addition WCCA TV provides: year round educational technology communications workshops and classes; stands as a respected community anchor institution standing for media democracy and creative innovation; presents community video programming available 24/7 ( 8,760 hours ) of a free flow of community news and information and learning programs annually; serves thousands of individuals and hundreds organizations in central Massachusetts, including a plethora of daily community television production activities, partnerships, and community media services for all ages including youth at risk operating year round; since 1986. Our programming is available to about 55,000 cable subscribers in Worcester MA.

We carry about 80 programs on our channel 13 and have one of the largest archives of community media presentations in the nation a small number include closed caption programming as afforded. The onscreen video programming guide of our multichannel video programming distributor (MVPD), Charter Communications System, does not provide a label or symbol indicating that the programs that do offer Closed captioning.

We have program descriptions and accessibility information readily available for our programs with accessibility options such as closed captions. However, currently, Charter Communications does not include our programming information unless we pay for it. That would be fine, however we do not receive enough funding through the cable franchise to run our operation to meet community needs as it is let alone to cover the cost for program guides or anything other than something generic. We are extremely challenged due to the underfunding we currently receive through the current cable franchise license.

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.

WCCA TV makes its channels available for local reading services as well as provide our own programming to meet such needs. This is not funded through the current licensing system. Our audio levels are consistently and substantially less decibel level than all the other channels, and despite numerous requests to address it no one has offered to assist in correcting that, so thus, 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

We urge the Commission to adopt rules that would require video programming guides and menus which display channel and program information to 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.

On Behalf of our Board of Directors, Staff and Community members

Mauro DePasquale, Executive Director, WCCA TV 13

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cc WCCA Board of Directors