



August 5, 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:

Community Access Television Services 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.

Community Access Television Services is a PEG station that provides 5 channels to local cable subscribers. These channels are comprised of one public access channel, one educational channel, two governmental channels and channel that provides SCOLA, which features news and programming from around the world. Our programming is available to 60,000-90,000 subscribers in Monroe County, Indiana.

We carry 15,000 programs on our 5 channels of which 15-20% are closed captioned. We carry the programs Air Force TV News, NASA 360, Democracy Now, and The Thom Hartmann Show which includes closed captioning on our channels. The onscreen video programming guide of our multichannel video programming distributor Comcast and Smithville Communications does not provide a label or symbol indicating that these programs have closed captions. In addition to this, our organization has met with and discussed with city governmental officials the possibility of providing closed captioning for our coverage of local governmental meetings. Although Community Access Television Services does not currently provide closed captioning for its governmental meetings, we are hoping to provide this service in the near future and having the program listed as having closed captioning on our cable provider's program guide would be advantageous for our organization as well as our viewing audience.

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 3, 7, 12, 14 and 96 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 our area, AT&T has 6 different local jurisdictions, and a total of 10 different PEG channels, on its “channel 99” PEG application. As a result, a visually-impaired subscriber, after inputting channel 99 and waiting for it to load, must somehow visually navigate a menu of 6 different local community jurisdictions and find and press the correct one, and then after that, visually navigate a sub-menu of 10 different PEG channels, and find and press the correct one, to reach our PEG channel. Moreover, AT&T PEG product’s lack of a truly effective “last channel” function for PEG creates yet more problems for the visually impaired if they wish to go to or from a PEG channel from or to a non-PEG channel to another.

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.

Thank you,

Jason Radke

Operations Manager,

Community Access Television Services