



**retn**

PO Box 4494  
Burlington, VT  
05406-4494

f: 802.654.7984  
e: info@retn.org  
p: 802.654.7980

[www.retn.org](http://www.retn.org)

Burlington  
Essex  
Essex Junction  
St. George  
So. Burlington  
Williston  
Winooski  
**Channel 16**  
Charlotte  
Hinesburg  
Ferrisburgh  
Shelburne  
Vergennes

**making media accessible**  
regional educational technology network

August 7, 2013

Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, DC 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:

Regional Educational Television Network, Inc. (RETN) submits this letter as a Reply to Comments in the above-referenced rulemaking proceeding (NPRM).

RETN is a member of the statewide Vermont Access Network (VAN) and RETN is a 501c3 Educational Access organization established in 1994 to provide local, educational programming services to cities and towns in our community. Since 2009, we have cablecast 24-hour programming, 365-days-a-year to nearly 40,000 households on Comcast cable systems in Burlington and eleven surrounding communities in northwestern Vermont.

On our Educational Access Channel 16 on three local cable systems we carry a number of programs that are closed captioned, including the daily news show **Democracy Now!** The onscreen video programming guide of our Multichannel Video Programming Distributor (MVPD), Comcast, does not provide a label or symbol indicating that this program has closed captions. Unfortunately, neither RETN's negotiations, nor negotiations by our statewide Public, Educational, and Governmental (PEG) Access association, VAN, has successfully resulted in access to Comcast's Electronic Program Guide (EPG).

We have program descriptions and accessibility information readily available for our programs with accessibility options such as closed captions. However, currently, Comcast merely lists each of our channels as "Local" or "Educational", not listing any program information on the programming guide. This level of information is inadequate to meet the accessibility goals of the Twenty-First Century Communications and Video Accessibility Act of 2012 (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.

RETN strongly agrees with the statements of several Commenters in this Docket, namely Montgomery County, Maryland; the Alliance for Community Media; the Alliance for Communications Democracy; Vermont Access Network; and others, that have urged the Commission to require that cable operators (MVPDs) provide programming description of PEG programming in their Electronic Program Guides, similar to that which they make available in their EPGs to other programming channels.

We urge the Commission to adopt rules that would require video programming guides and menus which display channel and program information for all channels, including 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 this Reply to Comments.

Sincerely,

Scott Campitelli  
Executive Director