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PHILLYCAM.ORG

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:

Philadelphia Community Access Media (PhillyCAM) 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.

PhillyCAM is the nonprofit organization designated by the City of Philadelphia to operate the public access television station. We are a community media center that brings together the people of Philadelphia to make and share media that promotes creative expression, democratic values and civic participation. Yearly we air over 4500 hours of locally produced content on Verizon 29/30 and Comcast 66/966. Our programming is available to over 400,000 subscribers in the City of Philadelphia, with a potential viewing audience of over 1 million people.

We carry over 60 weekly series of which 3 hours daily are closed captioned including *Democracy Now!*, Link TV's environmental news magazine *Earth Focus* and *View Change*, and Deutsche Welle TV's *Arts 21*, *Global 3000* and *Tomorrow Today*. But the onscreen video programming guide of our multichannel video programming distributor (MVPD) on Verizon Fios system does not provide any program information, label or symbol indicating that this program have closed captions.

In Fall 2012, PhillyCAM's program information began to be carried on the multichannel video programming distributor (MVPD) local programming guide on Comcast. This was a huge step forward for our station that has resulted in increased visibility and viewership of our channels. And being on the guide also gives Comcast cable subscribers with DVRs the ability to time shift their viewing and record PhillyCAM shows to watch at a time of their choosing.

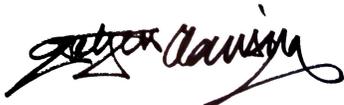
Because we are already preparing this information for Comcast on a weekly basis it would be very easy for us to do the same for Verizon. Instead we are only listed as Community Access with no program information whatsoever.

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 inquired about having our information also appear on the Verizon guide but they have been completely unresponsive to the issue. Viewers on Verizon 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.

Best regards,

A handwritten signature in black ink, appearing to read "Gretjen Clausing". The signature is stylized and cursive.

Gretjen Clausing, Executive Director

