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FCC Mail Room

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August 6, 2013

Federal Communications Commission  
445 12th Street, S.W.  
Washington, D.C. 20554Re: *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 Richland, Washington's CityView TV 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.

CityView is a government-access channel in and for the City of Richland, Washington, cablecast on the City's only multichannel video programming distributor (MVPD), Charter Communications on channel 13. CityView is available to all Charter subscribers in Richland, with a population of approximately 46,000.

We carry several dozen programs on our channel in any given week of which none are currently closed captioned; however, the onscreen video programming guide from Charter does not provide a label or symbol indicating that any program on CityView would have closed captions, if provided.

We have program descriptions and accessibility information readily available for our programs. However, currently, Charter only provides the label "Public Access" for channel 13 on the on-screen guide. 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.

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.

Mike Charboneau  
Cable Communications Coordinator  
City of Richland

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