



IDEAL Group, Inc.

2809 Bohlen Drive
Hilliard, Ohio 43026

Phone: (614) 777-0660

Fax: (614) 259-0013

TTY: (800) 750-0750

ideal-group.org

September 1, 2013

Ms. Marlene Dortch
Secretary
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, D.C. 20554

Re: Request for Comment Petition for Class Waiver of Commission's Rules for Access to Advanced Communications Services and Equipment by People with Disabilities: CG Docket No. 10-213¹, Coalition of E-Reader Manufacturers Petition for Waiver -- CG No. 10-213², and Ex parte letter supplementing Coalition of E-Reader Manufacturers Petition for Waiver -- CG No. 10-213³

Dear Ms. Dortch:

The Coalition of E-reader Manufacturers' assertion that browsers included with dedicated E-readers are "incidental to... accessing text-based digital works"⁴ is seriously flawed and inaccurate. It is not a justification for not making these browsers fully accessible to people with vision impairments and individuals who are blind.

For example, the Coalition of E-Reader Manufacturer's petition for waiver is a 12-page text-based digital work that includes 19 URL references⁵. The authors of this work included references to enable people to gain a full and accurate understanding of the intent and purpose of what they wrote. Accessing and reading these references requires the use of a browser.

Another example is Gerard J. Waldron and Daniel Kahn's ex parte text-based digital work supplementing the Coalition of E-Reader Manufacturers Petition for Waiver⁶. It included nine references to external digital works.

References are woven into the fabric of a majority of educational text-based digital works and require the use of a browser to access, read and acquire knowledge.

¹ <http://www.fcc.gov/document/petition-waiver-access-accs-services-and-equipment-0>

² <http://apps.fcc.gov/ecfs/document/view?id=7022314526>

³ <http://apps.fcc.gov/ecfs/document/view?id=7520931307>

⁴ *ibid.*

⁵ <http://apps.fcc.gov/ecfs/document/view?id=7022314526>

⁶ <http://apps.fcc.gov/ecfs/document/view?id=7520931307>

The reason authors weave references into the fabric of their digital works is to enable their readers to acquire as complete and accurate of an understanding of their writings as possible. This is what education is all about.

Browsers serve as bridges to knowledge that authors intend for their readers to consume as part of reading their digital works.

Browsers are critical to acquiring knowledge from Science, Technology, Engineering and Math (STEM) digital texts.

I am the President and CEO of a company that develops accessible Android browsers and E-readers. There are 10 million installations of our apps (and the apps we enhanced to be accessible)⁷ in 150 countries and U.S. territories⁸.

One of the reasons our E-reader (IDEAL Group Reader⁹) received a White House / Department of Education “Champions of Change Award for Innovation¹⁰” was that our embedded E-reader browser enabled students to:

1. access a wide variety of online bookstores to download and read E-books;
2. access external references while reading a chapter of a book in order to gain a better understanding of what they are reading at the time;
3. listen to streaming audio tracks included as part of an E-book;;
4. view streaming videos included as part of an E-book;
5. share notes with classmates and students in real-time through the use of cloud services;
6. translate foreign words to clarify their meaning;
7. download external content and add it to notes being taken within a chapter of an E-book;
8. automatically summarize chapters of open source and non-DRM protected digital works through the use of cloud services;
9. automatically render chapters of open source and non-DRM protected digital works into visualizations using cloud services; and,
10. the list goes on and on.

The reason the U.S. Department of Education, through their Wireless Rehabilitation Engineering Center (RERC)¹¹, provided technical guidance and funding to develop IDEAL Group Reader was due to the fact that it is critically important that all students have equal access to all E-books... including references, that being read on all e-readers... including dedicated E-readers.

⁷ http://apps4android.org/eos/Apps4Android_072913.htm

⁸ <http://www.apps4android.org/?p=4272>

⁹ <https://play.google.com/store/apps/details?id=org.easyaccess.epubreader>

¹⁰ <http://www.whitehouse.gov/blog/2012/05/07/stem-education-success-powered-ideal-s-epub3-reader>

¹¹ <http://www.wirelessrerc.org/>

Should anyone be interested, we would be pleased to show them how to make browsers included with dedicated Android-based, E-readers accessible to people with vision impairments and individuals who are blind.

Sincerely,

Steve Jacobs, President
IDEAL Group, Inc. and,
CEO, Apps4Android, Inc.
steve.jacobs@ideal-group.org
<http://ideal-group.org>
<http://apps4android.org>
Phone: (614) 777-0660
Fax: (614) 522-1031
TTY: (800) 750-0750

cc:

Mr. Louis Peraertz
Ms. Karen Peltz Strauss
Ms. Rosaline Crawford
Mr. Eliot Greenwald
Dr. Arnie Duncan
Dr. Michael K. Yudin
Dr. Sue Swenson
Dr. Charlie Lakin
Ms. Claudia L. Gordon
Ms. Jocelyn Samuels
Ms. Catherine Lhamon
Dr. Helena Mitchell
Dr. Mike Jones
Dr. John Morris
Dr. James Mueller