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Kris Monteith
Acting Bureau Chief
Consumer and Governmental Affairs Bureau
Federal Communications Commission
445 12th Street SW
Washington, DC 20554

Re: Reply to the Coalition of E-Reader Manufacturers' Petition for Waiver from CVAA
Accessibility Requirements, CG Docket No. 10-213

Dear. Ms. Monteith:

My name is Melissa Riccobono, and I am the President of the National Federation of the Blind of Maryland. I have been blind since birth, and I greatly enjoy reading. I am the parent of two blind daughters, and my husband and I have tried to instill our love of reading in them. Unfortunately, we as blind people, only have access to a very small percentage of all published books. This saddens me, and I am especially saddened that my children cannot enjoy many popular books until they are made accessible. Sometimes this happens fairly quickly, but other times the delay is tremendous. And, there are times when books are not made accessible at all. Access to all of the books should be made available using e-readers.

I strongly oppose the Petition for Waiver submitted by the Coalition of E-Reader Manufacturers', requesting that e-readers be exempt from the Twenty First Century Communications and Video Accessibility Act (CVAA).

Technology exists today which makes it simple for all e-readers to be made easily accessible. All digital content can be made accessible to a blind person if the content is programmed to be read audibly, and accessibility is considered during the design phase. I do not believe the Coalition's claim to make e-readers accessible would require a fundamental overhaul of the equipment.

I want access to digital books for myself. Since the first e-reader came out in 2006, I have felt like a second class citizen because I did not have full access to all of the books available, or the unique features present in e-readers which enhance the reading experience for so many sighted users. I want to be a mainstream user and would happily buy an e-reader if one was accessible, but the manufacturers continue to exclude me from their customer pool. I reject the Coalition's notion that to make their product accessible

would not provide me with any substantial benefits. In reality, it will give me options as a consumer and equal access as my sighted peers.

The Department of Justice and the Department of Education prohibit K-12 school districts and institutions of higher education from using inaccessible e-readers, yet the Coalition continues to knowingly sell inaccessible equipment to schools. As a parent of two young blind children, this practice concerns me greatly. I want my daughters to have access to e-readers when they begin to attend school. I want them to have all of the same experiences as their sighted classmates. This includes access to e-readers, as the paper textbook is fast disappearing from our nation's classrooms. The CVAA is consistent with preexisting legal requirements, and the FCC should not give the Coalition incentive to continue resisting accessibility.

The Coalition fails to provide any details on the lifecycle of its products or a potential time frame for the waiver. An indefinite blanket waiver would harm the public and be inconsistent with the CVAA should it not be granted in the face of these omissions.

Reading is a fundamental right for all people in this country. I feel I should be able to read all of the books my sighted peers are able to read. And, even more importantly, I need to be sure my daughters are granted this same right as they grow up to become readers.

I strongly urge the FCC to reject the Coalition's petition and uphold the spirit of the CVAA. E-readers and the ACS features found in that equipment must be made accessible and granting a waiver would perpetuate the digital divide and discrimination in the marketplace that I, other blind adults, and blind children face every day.

Sincerely,

Melissa Riccobono