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September 3, 2013

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:

As a recent graduate of Northwestern University in Evanston, Illinois, I understand first-hand the important role e-readers play in the lives of college students. E-readers provide students who invest in these products the opportunity to buy books at a cheaper price and allows them the convenience of having all of their books in one place on a small, lightweight and affordable device. However, as a blind student, I was not given this option.

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).

E-readers can easily be made accessible. All digital content can be made accessible to a blind person if the content is programmed to be read audibly during the design phase. The Coalition's claim that making e-readers accessible would require a fundamental overhaul of the equipment is false. After all, Apple was able to make all of their products accessible.

Furthermore, 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. The CVAA is consistent with preexisting legal requirements, and the FCC should not give the Coalition incentive to continue resisting accessibility. Although Northwestern did not require students to purchase e-readers, some students chose to (including my friend), and it is not fair that I am not allowed the same opportunity.

During my sophomore year of college, I was complaining to one of my peers about the cost of books. She said to me, “Why don’t you invest in a Kindle? The books are cheaper and almost all of the books I need for class are available. We could even share books!” I was all for this idea, but just to be sure, I tried her Kindle first. As it turned out, I was not able to use the device. Although my friend showed me how to enlarge the font and make the device read to me, that feature was only available once I was in the book itself—I could not access the book because the menus were inaccessible (meaning there was no way to enlarge the font or make the menus read aloud)! To say the least, I am very frustrated. I feel that I am being left behind simply because I am blind.

I strongly urge the FCC to reject the Coalition’s petition and uphold the spirit of the CVAA. E-readers and the advanced communications services (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 face every day.

Sincerely,

Rose Sloan