

Treva Olivero
603 South Vienna Street
Ruston, LA 71270
Treva@olivero.us

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:

This letter concerns access to e-readers for blind consumers. I am a blind student in graduate school getting my Masters in Education. For graduate school, I need access to digital e-readers that are available to other consumers. These readers are not accessible to me as a blind person. My college textbooks are available for these e-reading devices, and I don't have the same access to these electronic versions of textbooks because the e-readers do not have audio output that lets me use the devices to read and study my textbooks.

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).

The spirit of the CVAA is to increase the accessibility of mobile advanced communications services (ACS) and e-readers have ACS functionality. Most e-reader users I know post to Facebook and exchange books with friends. It would not make sense to grant a waiver for a class of products that are clearly intended to be covered by the CVAA.

The Coalition claims that the primary purpose of e-readers is reading, not ACS, and yet I believe that the ACS found in e-readers is part of the intended purpose. The ability to connect with friends, share content, and access the internet are the very features that set e-readers apart from print books. ACS facilitates the reading experience and is, therefore, a co-primary purpose of e-readers. As a blind person who enjoys reading and wants to share my love of books with friends, equal access to these e-readers is important to me.

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, audio output like speakers

or a phone jack are added, and accessibility is considered during the design phase. The Coalition's claim that to make e-readers accessible would require a fundamental overhaul of the equipment is false. To let them have this waiver will allow them to shirk their responsibility in making their devices accessible to all consumers, including those of us who are blind.

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. This impacts me as a future teacher of blind students. Blind students do not have the same access to these devices as their sighted peers. 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, is inconsistent with the CVAA, and should not be granted in the face of these omissions.

Recently, I began looking for my books for the next quarter in my classes in graduate school. The textbooks were available in a format for e-readers. Unlike my fellow sighted graduate students, I don't have the option of purchasing the books for an e-reading device that is not on my phone. These devices do not have features that make it accessible to me as a blind person.

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 face every day.

Sincerely,

Treva Olivero