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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:

I have been totally blind since birth. I have worked in the technology industry since 1977, as a sales representative, programmer, and help desk support specialist for IBM, and a trainer and supervisor in a company teaching computer skills to people with disabilities. I am currently an instructor at Baruch College, and I am part owner of B&F Teaching & Technology, an assistive technology training company.

I am part of the "knowledge industry". When I'm not teaching, I'm learning, and much of that learning is done through books. Since technology changes at a rapid pace, these books must be up-to-date.

The National Library Service for the Blind and Physically Handicapped (NLS) produces about two thousand books a year, and most of them are for recreational use. The other major sources of accessible books for the blind cater to students. It can take weeks or months to get a book digitized by one of these sources, a delay I cannot afford if I want to remain competitive.

The only practical option left is to hire a reader at a minimum of \$10 an hour. That's pretty expensive, compared to the promise of accessible digital books through e-readers.

E-readers hold out the promise that I could get the same books as my sighted colleagues and competitors at the same time and at the same price. The only problem is that the E-reader manufacturers have persistently and repeatedly resisted making these devices accessible to me, even when it is technically feasible for them to do so.

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) for the following reasons:

The Coalition claims that Advanced Communications Services are not a primary function of e-readers. This is, I believe, simply false. On the Kindle marketing Web page, ([http://www.amazon.com/gp/product/B008GG93YE/ref=kindle\\_dp\\_comp](http://www.amazon.com/gp/product/B008GG93YE/ref=kindle_dp_comp)), Amazon touts 31 features. Nineteen of these features involve advanced communications services. They include, but are not limited to:

- Built-in Wi-Fi.
- Free Wi-Fi at AT&T Hotspots.
- Find a book and start reading in seconds with our fast, free wireless delivery.
- Free Library Backup.
- Search Wikipedia and the Web.
- You and your approved contacts can e-mail documents - including Word, PDF and more - directly to your Kindle and read them in Kindle format. You can also send documents to your Kindle using Send to Kindle.
- Share your passion for books and reading with friends, family, and other readers around the world by posting meaningful passages to social networks like Facebook and Twitter directly from Kindle, without leaving the page.
- Share your notes and see what others are saying about Kindle books. Any Kindle user - including authors, book reviewers, professors and passionate readers everywhere - can opt-in to share their thoughts on book passages and ideas with friends, family members, colleagues, and the greater Kindle community.

The CVAA's purpose is to make devices with advanced communications services more accessible to people with disabilities. Exempting e-readers, with prominent advanced communications services would, therefore, thwart both the spirit and the letter of 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, 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.

Access to digital books through e-readers would provide me with many substantial benefits. As I stated above, the ability to read a book in my field at the same time and cost as my sighted colleagues would make me more competitive in my chosen profession, and would save me a lot of money.

The Department of Education and the Justice Department prohibits K-12 schools and colleges from using e-readers, unless they are accessible to the blind. The FCC should act consistently with these government mandates requiring accessibility.

The digitization of books holds out the promise that the print barrier might come crashing down for blind people, not some time in the future, but now. We have the technology, we simply need to ensure that entities such as the members of the Coalition obey the law and make their products universally accessible. I strongly urge the FCC to reject the Coalition's petition and uphold the spirit of the CVAA.

Sincerely,

Richard Fox