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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 am a blind woman, a volunteer advocate for blind people and parents of blind children, an active member of my community, and a retired social services worker for my county's Department of Job and Family Services. In every way you can imagine, reading is vitally important to me. 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 are built with ACS functionality. Most e-reader users I know use them to 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, but clearly 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. My sighted family members and friends use these features all the time, and I would like to join them.

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 is 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 absurd.

As it stands now, if I want to read a Kindle book, I have to buy an expensive Apple iPad. Then I can download the free Kindle app, but even then that application is not fully accessible. 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 contention that making their product accessible would not provide me with any substantial benefits. In reality, doing so would give me options as a consumer and equal access with 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 knowingly to 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.

Many of my family members and friends have now converted to e-readers, but I am still limited to the Library Of Congress offerings. I can't discuss recent books with my friends, and I generally feel like a second-class citizen.

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 the discrimination in the marketplace that I face every day.

Sincerely,

Barbara Fohl