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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 writing as the Chairperson of the Governor's Advisory Council on the Blind, Elderly & Disabled Transit Advisory Committee, and the Employment First Oversight Commission which promotes employment of people with disabilities. I am also the vice president of the Central Chapter of the Delaware NFB and twice president of local LIONS clubs in Delaware and a member for over 30 years.

As a totally blind 56 year old Delawarean who lost vision as a young adult after graduating from high school with enough sight to read printed books without the assistance of assistive technology or magnification, I have missed the opportunity to read current books for many years due to my blindness. The ability to have access to current, best sellers, and the infinite selection of digital books is a dream come true! I would no longer have to wait for months or years to be able to read the books of my choice. I believe that this would also provide unknown opportunities for current and future children and young adults, by including them into our modern society.

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 other social networks, they also 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.

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.

It is a fact that 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 totally false.

I want access to digital books. Since the first e-reader came out in 2006, I have felt like a second class citizen missing out on all of the innovative benefits of digital books. I want to be a mainstream user and would happily buy an e-reader if one was accessible. 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. The CVAA is consistent with preexisting legal requirements, and the FCC should not give the Coalition incentive to continue resisting accessibility.

The CVAA requires that ACS be accessible, and the FCC should not allow some services to be more important and others worthy of a 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.

The Coalition fails to provide any details on the lifecycle of its products or a potential time frame for the waiver. 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,  
Lloyd Schmitz