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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:

I am an instructor at the Louisiana Center for the Blind where I have the chance to work with hundreds of blind adults from around the country. Additionally, I am blind and use various devices to access print information. Unfortunately, for the past several years, I have been denied the ability to use e-readers because of lack of nonvisual access. Although some progress has been made, blind Americans are unable to use e-readers to share information, post to social media, and access digital content.

I am writing to ask that you deny the request by the Coalition of E-reader Manufacturers for a waiver requesting that e-readers be exempt from the Twenty-first Century Communications and Video Accessibility Act (CVAA). Granting this waiver would contradict the purpose of the Act and perpetuate discrimination against blind individuals.

Manufacturers of e-readers falsely claim that making their devices accessible would be a financial impossibility. They also inaccurately claim that e-readers are primarily used for reading and that advanced communication services (ACS) are not an important part of these products. I vehemently disagree with this assertion. Sharing information and accessing the Internet are critical elements of e-readers which make them different from print materials. These ACS features are essential to the e-reading experience.

More and more educational institutions are using e-readers in the classroom. The Department of Justice and the Department of Education have prohibited K-12 entities and universities from purchasing inaccessible devices. The FCC needs to support this effort and not allow the Coalition to knowingly continue to sell inaccessible products. Granting a waiver would be a huge step backward and only serve to increase the "digital divide" for blind people.

The Coalition does not provide any data to back up its claims. E-reader manufacturers need to include universal design and accessibility from the “ground up.” The data simply does not support their claims.

I strongly urge that the FCC deny the Coalition’s petition for a waiver. Full access to digital e-readers is imperative both personally and professionally. Blind Americans deserve equality.

Thank you.

Sincerely,
Roland Allen