

Kris Monteith
Acting Bureau Chief
Consumer and Governmental Affairs Bureau
Federal Communications Commission
445 12th Street SW
Washington, DC 20554

September 3, 2013

Re: Reply to the Coalition of E-Reader Manufacturers' Petition for Waiver from CVAA
Accessibility Requirements, CG Docket No. 10-213

Dear Ms. Monteith:

In the matter of Amazon (and others) who seek exemption from both the 1934 Communications Act and the recently enacted Twenty First Century Communications and Video Accessibility Act, I am one of the people who will be most affected by this.

Though Amazon (and others) claim to seek this exemption for every disability, it is evidently clear that most disabilities don't need accessibility in such devices. For instance, the deaf can read well without the use of sound, the mobility impaired can (with only a few exceptions) manipulate the controls just the same as most others. However, the blind cannot manipulate any of the controls on such devices without either a tactile or audible feedback. The claims that Amazon (and others) are making are specious on their face. As proof, I offer the example of Apple and their various devices and software. They have made every attempt to be as accessible as possible to every class of disability as is possible. As a result, their equipment and software are used by a majority of the blind and done so easily. The cost of their equipment is comparable to that marketed by other entities that don't offer such features. Apple is proof that designing in accessibility from the start costs very little and gains them much in market share (as well as being profitable).

There is only 1 reason why Amazon (and others) would choose this route: they intend to create niche market items that are so specialized as to be useful only to one class. Like other vendors of such products, they would increase the price well beyond the reach of most of the blind to be able to afford. As an example: the manufacture of the Braille Sense U2 costs less than \$200 per unit to manufacture and yet the retail price exceeds \$6,000 per unit here in the US. This is largely owing to the fact that such vendors use an income stream model where the devices are funded by the government. Under this model, Amazon (and others) would be able to charge far higher prices and sell them to the various Vocational Rehabilitation Agencies. This would put the blind back into having to justify acquiring such equipment (and most times being denied). This cannot be allowed.

There is also one other point: Amazon recently suffered the consequences of litigation as a result of trying to market their inaccessible devices to students and to make such equipment a necessary part of that course completion. This violated the Americans with

Disabilities Act. Both Amazon and the institution involved were found in violation and required to make recompense under the law. For this reason, they should not be allowed the exemption.

On the face of it, Amazon (and others) seek the exemption so as to circumvent the law of the land. They also claim that including such accessibility features would be an onerous cost (which it will not given Apple Corp's example). Their short sightedness in asking for this exemption would, in the long run, be far more costly.

Thus, I request that you deny the application for exemption. I request this, not only for myself, but also as a member of 3 major organizations for the blind here in the US (the National Federation of the Blind, the American Council of the Blind and Lion's Club International). The current estimated population in the US that suffers print disabilities (such as visual impairment, dyslexia and some other related issues) exceeds more than 50 million individuals in all population age groups. This, gentlemen, is a non-trivial percentage of the population of the U.S. We cannot allow Amazon (and others) to deny us the basic right to read with whatever method we can use (be it Braille, Audio or other means not listed here).

Thank you for your consideration.

Eric Oyen