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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 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 Face book 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, and yet 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.

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. If I want to read a Kindle book, I have to buy a very-expensive Apple iPad. Then I can download the free Kindle app, but 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 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.

I am a professional vocational rehabilitation counselor. Electronic books provide an avenue for my engagement in professional development activities. It is indeed unfair to know that my sighted counterparts can utilize ACS and engage in collaborative interchange that is essential to full participation in terms of equality with my sighted colleagues.

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,

Johnnie Slaton