

Jill D. Richmond
2826 Ivory Lane
Port Republic, MD 20676

September 3, 2013

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

Received & Inspected

SEP 09 2013

FCC Mail Room

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

Dear Mr. Monteith:

I am the mother of a blind college student. Digital books are extremely important both for personal use as well as for textbooks and other books needed for college students.

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 for several reasons.

First of all, 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 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. Moreover, the Coalition claims that the primary purpose of e-readers is reading, not ACS. 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. 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 false.

Finally, digital books are critically important. If a person who is blind wants to read a Kindle book, they have to buy a very-expensive Apple iPad. People who are blind want to be mainstream users and would buy an e-reader if one was accessible, but the manufacturers continue to exclude them.

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,



Aaron S. Richmond
2826 Ivory Lane
Port Republic, MD 20676

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

Dear Mr. Monteith:

I am a blind college student. Digital books are extremely important to me both for personal use as well as for textbooks and other books needed for college and for me to become a successful college graduate.

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 for several reasons.

First of all, 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 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. Moreover, the Coalition claims that the primary purpose of e-readers is reading, not ACS. 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. 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 false.

Finally, I need access to digital books. Since the first e-reader came out, 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 buy an e-reader if one was accessible, but the manufacturers continue to exclude me.

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,

A handwritten signature in black ink, appearing to be "Richard", written over a horizontal line.