

Before the
Federal Communications Commission
Washington, D.C. 20554

In the Matter of ACCESSIBILITY OF COMMUNICATIONS TECHNOLOGIES FOR THE
2014 BIENNIAL REPORT REQUIRED BY THE TWENTY-FIRST CENTURY
COMMUNICATIONS AND VIDEO ACCESSIBILITY ACT

Pleading Cycle Established

CG Docket No. 10-213

These comments are provided on behalf of the American Council of the Blind (ACB), a nonprofit organization that represents the interests of blind and visually impaired people throughout the United States. Based in the Washington D.C. area, ACB has tens of thousands of members from across this country who belong to more than 70 state and special interest affiliates. Being the nation's leading blindness organization, ACB represents members from all walks of life who display interests in a variety of activities including business, education, the arts, to name a few. Its special interest groups are comprised of, among others, teachers, government employees, attorneys, students, information technologists, and artists.

ACB and its affiliates conduct a large number of advocacy, social, and cultural activities. Central to these are many activities such as collaboration with the government, K-12 and higher education, the private sector, and international entities to improve opportunities for all blind and visually impaired people. The comments below are a sampling of feedback we have received from individual members.

Signaling Devices

When a deaf-blind individual receives a text or notification on a device, there is not a way by which they can be signaled. A device, which would make notification of these alerts possible would be useful so that they are able to tell when they receive texts and other notifications without constantly checking the device itself.

E-readers

E-reader devices do not provide the ability to read or post reviews accessibly on books that are to be purchased. While some devices have accessibility features built in, this accessibility is only provided at certain price points.

Comcast box

1. Remote is easy to use.
2. Accessibility can easily be enabled.
3. Troubles selecting channels:

Summary: This box is in beta and does have bugs. We are very encouraged that Comcast

has decided to take this step and make television accessible for the blind. As far as we can tell, no other companies have made this step.

Android

While the Samsung GALAXY S5 is more accessible, previous devices are not. This is also not something that is inherent across all devices. All devices should be accessible, not just a select few. This could be achieved by greater communication of expectations from the carrier to the OEM. It is ACB's observation that the relationship between the two parties is often the reason why accessibility is either obscured or broken on various handsets.

Windows phone

We commend Microsoft for starting accessibility, but there is much more work left to go. While there is a built-in screen reader, it is lacking many features which would enable it to be usable on a daily bases. Accessibility should span the entire device.

Windows PCs

These systems are not natively accessible without purchase of a screen reader costing \$1000. Many metro apps are not accessible in the app store. Many people find the app store overly difficult to use and thus avoid it. Enabling accessibility is much harder, even to use the somewhat limited built-in screen reader, as there are multiple steps to enabling speech. Many view Narrator in its' limited capacity as a stepping stone, only to allow them to install a third-party screen reader.

Applications

Skype

1. Concern about the new UI rewrite.
2. Frequently Skype upgrades break accessibility and render Skype much harder to use until the next upgrade. This is, however now limited to only Skype, but is frequent to many apps and websites.

Walkie Talkie Like Apps

Applications such as Heytell and Zello are accessible and are a great example of an app that can be fully used. They provide a two-way communication mechanism by enabling voice clips to be sent back and forth, much like instant messaging with voice.

Application Summary

A committee should be established, whose purpose will be to validate or invalidate whether a specific application is accessible. If a company wants to advertise an app as accessible, this validation process would provide a seal of approval, which would indicate that the app is accessible and has been validated as such.

Web Accessibility

Website accessibility has been improved over the last few years. There are still numerous companies whose websites are inaccessible and either extremely difficult to use, or are totally unusable. For example, Netflix offers no provided audio descriptions for the blind. Many interfaces are also inaccessible.

Home Appliances

As home appliances (heating, cooling, etc.) are becoming more advanced, frequently the only interfaces through which to control them are through a touch-screen, or an app which may or may not be accessible. As these devices are increasingly more prolific in households, a mechanism should be established by which they are made accessible and usable; through the provided apps, as well as through the system itself.

Smart Televisions

While some high-end Samsung televisions have voice guidance, they are only installed on high-end devices. These devices cost upwards of \$2000 and are not affordable by most people. Many other smart televisions or apps such as Netflix do not provide the ability for communication. For example, prior to watching Netflix shows, one can read comments posted by other users and comment subsequent to watching the show. This feature, which enables users to discuss and review individual shows is generally not accessible.

IP relay

There does not currently exist any braille device to enable IP relay for deaf-blind individuals.

Respectfully submitted,

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