

Comments on National Deaf-Blind Equipment Distribution Program (NDBEDP)

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Inclusive Technologies

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Inclusive Technologies, a small business consultancy on accessible ICT, is grateful to the Commission for this opportunity to comment on the National Deaf-Blind Equipment Distribution Program (NDBEDP).

Program Evaluation Research

§22 refers to the collection of information by certified programs so that the Commission can assess the effectiveness of the Program. The Commission should reserve some portion of the NDBEDP funding to perform deeper, ongoing research into the effectiveness of the Program, linking the operation of the Program to its intended purpose, "...to make telecommunications service, Internet access service, and advanced communications, including interexchange services and advanced telecommunications and information services, accessible by low-income individuals who are deaf-blind." Through this research the Commission could uncover answers to questions pertaining to how the Program operates, such as:

- Are potential users receiving the equipment they actually need?
- Are they using it effectively for the intended purposes? If so, is the use of the equipment leading to greater social integration and achievement of educational and employment goals? How could the Program be modified to improve its effectiveness in these dimensions?
- Is the range of equipment adequate?
- Is the performance of the equipment adequate?

Much of this information can be collected in the normal course of operations, rather than requiring a separate data collection effort.

Market Stimulation

§16 asks about the kinds of equipment the Program should distribute, and under what conditions. The NDBEDP accounts for a significant portion of the total market for the devices and services it covers, probably reaching 50% in some cases. Thus the Program provides an opportunity to drive innovation via public-private partnerships and planned coordination leading to more effective devices and services at lower prices. That is, because this program provides a significant portion of revenues to companies that manufacture and distribute the relevant products, the Commission could—and indeed should—influence product design in ways that would improve the effectiveness and efficiency of the Program. Other large-scale public procurement initiatives, including but not limited to military procurement, have long records of such gains in both innovation and efficiency. The relative scale of the Program and its

stable source of funding could prove attractive to both incumbent manufacturers and new entrants, if clear equipment performance requirements and a carefully crafted procurement schedule were widely publicized to industry. For example, it is probably demonstrable that the features and prices of refreshable braille displays under current unmanaged market conditions are significantly different from those that might be established by a coordinated design competition followed by the award of a guaranteed sales volume for a set period of time. Such an initiative might begin with a study of the economics and public policy feasibility of such programs in other or related domains.

Coordination of Equipment Awareness and Distribution Programs

§§17-21 of the Public Notice ask about related services such as individual assessment, outreach, training, and installation, and refer to the shortage of trained assistive technology specialists for evaluation and training. This is a well-known truism, reported across the board wherever assistive and accessible technology services are discussed.

However, it may be that the cadre of specialists is not always being used efficiently. In addition to the NDBEDP programs, there are other public sector programs, functioning in most cases at or below the state level:

- National Network of ADA Centers
- Tech Act Programs
- National Library Service
- State Equipment Distribution Programs

These programs are not closely linked in most cases, and often spend their small budgets on activities such as outreach, training/awareness events, and showrooms in inefficient ways. In order to foster additional operational coordination, the Program could either make it a requirement for certification, or offer a bounty to state projects that can demonstrate high levels of coordination.

Note that a coordination initiative should include, where feasible, partnerships with mainstream vendors such as wireless companies, whose retail outlets could provide excellent points of outreach. For example, AT&T, in cooperation with the Wireless RERC, recently held a series of consumer accessibility awareness and training sessions.

Technological Horizon Scan

The current Public Notice does not raise the issue of research and development, which was included as a topic in the original NPRM. If the Commission has abandoned this goal, I urge that that decision be revisited. There is a need for more practical supported research into advanced technologies that will benefit this category of highly jeopardized consumers. However, it may be that the Commission decided that actual exploratory development should be supported by other federal R&D initiatives and by private industry. If so, I would suggest that the Commission provide some measure of input into the R&D agenda, and evaluation of its results.

However, the Commission should, on its own and as an integral part of the NDBEDP, support a certain amount of research intended to identify as early as possible technological trends and potential breakthroughs that could have an effect on the program's capabilities. This 'horizon scan' function could include:

- Trends in mobile devices, services, and apps that might be useful to the program's beneficiaries, as a supplement to or substitute for equipment currently being distributed
- Emerging technologies that might be mature enough within just a few years to improve the effectiveness or efficiency of current devices, such as speech technologies and haptic displays.
- Mainstream trends that will affect the larger ICT environment in which the program's beneficiaries will operate, such as the mass deployment and adoption of immersive or augmented reality interfaces.

Thank you again for this opportunity to comment on this essential program.