



April 14, 2020

Darryl Cooper
Consumer & Governmental Affairs Bureau
Federal Communications Commission
445 12th Street SW
Washington, DC 20554

RE: Public Notice Comments on the Accessibility of Communications Technologies to inform the 2020 CVAA Biannual Report to Congress (CG 10-213)

Dear Mr. Cooper:

On behalf of the Consortium for Citizens with Disabilities Technology and Telecommunications Task Force, we thank the Federal Communications Commission (Commission) for this opportunity to comment on the Commission's Public Notice seeking input on the 2020 Biannual report to Congress required by the 21st Century Communications and Video Accessibility Act (CVAA)(PL 111-260)(DA 20-216).

The Consortium for Citizens with Disabilities is a coalition of more than 100 national disability organizations working together to advocate for national public policy that ensures the self-determination, independence, empowerment, integration and inclusion of children and adults with disabilities in all aspects of society. The Technology and Telecommunications Task Force focuses on national policy regarding matters of telecommunications and technology, including assistive technology, in order to help move society toward our ultimate goal of full inclusion for all people with a disability.

For nearly ten years, we have worked to codify and implement the CVAA. We believe the CVAA has largely increased accessibility for people with disabilities. The increased amounts of accessible wireless devices, video content and equipment is directly related to the CVAA requirements and the collaboration between the Commission, industry, and the disability community. As we near the tenth anniversary of the CVAA, we remain committed to protect the requirements of the CVAA and to ensure the most accessible technology and telecommunications experience for all consumers.

Mobile and wireless devices continue to show great innovation and provide enhanced access for people with disabilities. Native screen readers for smartphones are becoming increasingly dynamic and offering a seamless experience for consumers. Additionally, it is becoming more common for smartphones to connect to peripheral assistive technology devices such as a braille display or braille note taker. For example, a subscriber of Apple TV Plus now has the choice of video content with 9 languages of audio description, 40 languages of closed captioning, and a Deaf blind consumer may read the closed captions in braille on a Bluetooth connected braille display.

Smartphone manufacturers have continued the seamless integration of screen readers into Internet browsers. Internet browsers, such as Apple Safari and Google Chrome, offer a robust web experience when navigating with Apple VoiceOver and Google Talk Back. The greatest innovations since the past Biannual Report to Congress have come with the improved accuracy and expanded capabilities of voice assistants. These voice assistants, such as Apple Siri, Amazon Alexa, and Alphabet's Okay Google, allow a user to control their device, search the Internet and complete numerous skills through voice commands.

The growth of the Internet of Things (IOT) market continues to offer boundless potential and accessibility challenges for disabled consumers. Many smart speakers and smart home appliances, like thermostats, video-capable doorbells, and home appliances allow for quick set-up and control using a smartphone or Internet-connected mobile device. However, these products lack built-in out-of-the-box accessibility native to their own hardware, and instead, rely on the accessibility suite of a consumer's mobile device. As a result, these IOT devices are not accessible to consumers who do not use or cannot afford a smartphone with native accessibility features.

The current COVID-19 pandemic crisis brings to light the need for all video communications platforms, in addition to audio and text advanced communications services to be accessible. Whether for students learning remotely, employees continuing to work from home, or individuals seeking remote health diagnosis, it is clear that society is moving toward video communications services to provide distance learning, teleworking and remote healthcare. The Commission must define interoperable video communications services to include all two-way communications services between devices that include any combination of video, audio and text communications, and mandate that these services are covered by the accessibility requirements for advanced communications services.

As the Commission noted in the 2018 Biannual Report to Congress, non-smartphones continue to lag the market in offering robust accessibility features for consumers. According to research performed by the Rehabilitation Engineering Research Center for Wireless Inclusive Technologies (Wireless RERC) and shared with the Commission in 2017, this discrepancy is greatest for consumers who receive wireless service through the Lifeline program. The Wireless RERC found that in addition to lacking the accessibility features in devices available to the general public, only 17% of Lifeline devices are capable of receiving Wireless Emergency Alerts. The Commission must mandate that all Lifeline eligible devices receive and display in an accessible format Wireless Emergency Alerts, so that vulnerable citizens, including those with disabilities, are not placed at greater risk due to not receiving Wireless Emergency Alerts.

We thank the Commission for the opportunity to weigh in on the 2020 CVAA Biannual Report to Congress. If you have questions pertaining to these comments, or need further information, please do not hesitate to contact the Co-Chairs of the Task Force. We appreciate the opportunity to work with the Commission toward promoting true universal access, and we look forward to working with the Commission and all industry partners as we move into the second decade of the CVAA.

Sincerely,

The CCD Technology and Telecommunications Task Force Co-Chairs

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