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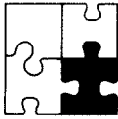
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February 24, 2000

Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Docket #
**RE: FCC-99-339: Notice of Proposed Rulemaking in Implementation of
Video Description of Video Programming**

To Whom It May Concern:



374 Congress St
Suite 301
Boston, MA 02210
(617) 695-1225 V/TTY
(617) 482-8099 FAX
www.adaptenv.org
adaptive@adaptenv.org

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Valerie Fletcher

We appreciate this opportunity to comment on FCC-99-339: Notice of Proposed Rulemaking on Implementation of Video Description of Video Programming. We are a non-profit organization promoting, facilitating, and advocating for international adoption of policies and designs that enable every individual, regardless of disability or age, to participate fully in all aspects of society. As such, we commend you on your proposal to phase descriptive video into prime time and children's television programming, and wish to respond to this proposal.

We believe that requiring the largest networks be the first to provide descriptive video is an excellent idea, particularly since it would reach the largest possible audience while imposing the least possible financial burden. These networks would reach an even larger audience if they were required to provide descriptive video to both prime time and children's programming, rather than having the option of one and/or the other. Such a requirement would not necessitate a change in the minimum number of hours of programming required, although both adults and children with disabilities would benefit from such a change. We also feel that networks should make a special effort to provide descriptive video for programming which may be of particular interest to people with disabilities.

We agree with the proposed assignment of responsibility for video description to programming distributors themselves, rather than to producers, as this will encourage distributors to carry programming for which producers have provided descriptive video. Producers will therefore be more likely to provide descriptive video, in order to make their products more attractive to distributors.

We support the Commission's plan to phase in descriptive video beginning 18 months or less after the effective date of its rules. We feel that the sooner access to television programming is provided to all people, the better, for both the media and the audience.

We are in favor of the proposed minimum requirement of *at least* 50 hours of programming per quarter. While we understand that networks may have limited resources for the provision of descriptive video, we note that, as the Commission itself has pointed out, public stations with far fewer available resources have

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been producing described programming for some time, with no legal incentive to do so.

We suggest, in order to ensure that people with disabilities are aware of the timing and availability of programming with descriptive video, that the networks providing such programming make a concerted effort to communicate with this particular community. Materials should be provided in print, large print, Braille, audio and electronic formats, to Independent Living Centers and other agencies serving people with disabilities. Described programming should be indicated in print, televised and online television listings. (Online listings should follow guidelines for accessibility as outlined by the World Wide Web Consortium). Networks should also provide public service announcements making their audiences aware of available programming, and should form alliances with parenting and educational organizations and with groups representing people with disabilities. Furthermore, networks should promote their described programming in schools, day care centers, special education classrooms, educational publications and parenting-related periodicals.

We agree that scrolling public safety messages must be made accessible to people with visual disabilities, and that open description is an effective method of providing this information to the blind and visually impaired populations. As video description and use of the SAP channel becomes more commonplace, perhaps such messages can become part of the descriptive video channel instead.

Once again, we thank you for your time and consideration of these matters. Please feel free to contact us at (617) 695-1225 if you have any questions.

Sincerely,



Valerie Fletcher
Executive Director



Rachel H. Tanenhaus
Research Assistant

c.c. Pam Gregory