

March 15, 2000

Magalie Roman Salas
Office of the Secretary
Federal Communications Commission
445 Twelfth Street, S.W., TW-A325
Washington, D.C. 20554

Dear Ms. Salas:

RE: COMMENTS ON NOTICE OF PROPOSED RULEMAKING
IN THE MATTER OF VIDEO DESCRIPTION OF VIDEO PROGRAMMING

MM Docket No. 99-339

Members of the National Federation of the Blind of Ohio are deeply concerned to learn that the FCC has determined to require descriptive-video broadcasting of prime time programming, on even a limited basis, before addressing the truly important issue--the need for voiced crawl information on local broadcasts and speaker identification on all newscasts. Some blind people enjoy descriptive video, but surely none of us would prefer to watch such a program rather than being warned that a tornado is about to descend on our neighborhood. The electronic music that presages the appearance of a print crawl is frustrating to a blind watcher in the extreme. One has no choice but to go turn on a radio and try to determine what the warning might be. This lack of equal access is a situation that truly does require redress.

Not knowing which public figure is making a statement on the evening news is almost as frustrating. One can, of course, live without knowing who was speaking, and one might not survive the tornado, but if it were not useful to identify speakers, broadcasters would not bother showing the print labels. Without doubt, formulating one's opinions as an informed adult is much enhanced by the ability to match the views expressed on the news with the names of those expressing them.

Then there is the matter of contact information scrolling down sportscasts, business reports, weather reports, and commercials and infomercials--those who cannot see well enough to read print on television miss it all. Such information can be important to us, and it is almost entirely impossible to track down the data after the fact. Again, in the view of blind Ohioans solving this problem is actually more important than requiring

programmers to video-describe prime-time entertainment.

Enough blind people enjoy audio description that it would be a fine thing to encourage its production. But sighted people are mistaken when they assume that providing video description is analogous to providing closed captioning for the deaf. It is not. With closed captioning the challenge is to transcribe the words spoken and roll the text for those interested. The data required are defined and the amount of captioning needed clear.

With video description I do not know how to tell those producing it what is needed because what different blind people want to know--or even believe that they need to know in order to grasp the program's content--differs profoundly. People who have been blind all their lives frequently have no particular interest in peripheral physical details like the color of a dress or the age and attractiveness of a person. Other people who have recently lost sight will feel these details to be essential. If they are included, one group will find them annoying; if they are omitted, the other group will feel cheated.

A recent experience will illustrate another aspect of the dilemma. NPR did a story on the FCC's hearing on this matter during which they played a clip from the video-described version of *Titanic*. The voice over said something like: "They look down the passageway and see in the distance a very wet six-year-old child crying." I don't believe the text was as concise as I have just rendered it, but this was the gist. As an experienced blind person, my reaction was that from the movie soundtrack I could hear behind the video-description voice, it was obvious that the child was about six and that he or she was crying. The distance of the voice also communicated how far away the child was. The only two pieces of information that were not already available to me were the facts that the child was wet and that he or she was in a passageway, and even those two facts might have been obvious in context. After all, the ship was sinking, so water was coming in. Any experienced blind person would have automatically drawn the conclusions I did, and many would have found the voice-over superfluous. But older people just losing sight and unused to letting their ears provide such data might have missed the nuances and therefore would have needed the information. But if such information is frequently provided by aural explanation, how will newly blind seniors learn to draw these conclusions for themselves--a skill which will serve them all day long? How can you meet these divergent wishes? You can't.

I conclude that it is far better for the FCC to concentrate on delivering something essential to personal safety and informed citizenship than to insist that broadcasters spend money providing description for entertainment that cannot possibly meet the needs and wishes of all the people who might be inclined to use it.

In conclusion I would say that blind people have no objection to video description; some of us actually like it. But providing it is an art, not a science, and mostly it is overdone and annoying even to the people it is intended to assist. The FCC should not require its introduction at this time. It would be far better for the FCC to concentrate on trying to see that blind people have equal access to the print information sighted TV watchers take for granted. The NFB of Ohio has passed resolutions through the years instructing its officers to pressure Ohio television stations to provide the information we truly need and want. We have gotten nowhere. It will clearly take encouragement from above before our access needs will be addressed by the broadcast industry. Please don't use the FCC's authority to force through something as fundamentally frivolous as descriptive video in entertainment television when our need for real information goes unmet.

Respectfully submitted,
Barbara Pierce, President