

Dear Ms. Salas:

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

MM Docket No. 99-339

I am glad to take this opportunity to comment on FCC's proposal to mandate audio description by television networks and stations using the Secondary Audio Programming (SAP) function. As a member of the National Federation of the Blind, I voted to pass a resolution in 1996 (96-04) which opposes federally mandated audio description. There are several reasons for my opposition.

Not all people find audio description useful. In fact, some people find it annoying. Since there are no standards stipulating which images should be described, there are often descriptions of unnecessary information. Thus, I prefer to use other clues to obtain information about the plot or characters in a movie. By electing not to use audio description, pertinent information is not lost, and voiceovers do not repeat irrelevant information..

Before mandating description for entertainment purposes, other information pertaining to safety should be accessible. Severe weather warnings or emergency information scroll across the bottom of a television screen. Making this information accessible ought to be a priority over descriptions in movies or television programs.

I am an eighth-grade Spanish teacher, and I find the SAP function useful to me in several ways. I can turn on the function and record programs in Spanish to present to my students. Secondly, I use the SAP function for my own enrichment. Though I spent time in Mexico, I find that teaching level 1 is not sufficient for maintaining my fluency. By using the SAP function for watching Spanish programming, I can practice the skill of comprehending Spanish. If the SAP function covered descriptions of movies, I could not utilize the channel for English-Spanish translations.

I recommend that the FCC refuse to mandate description of videos and movies for entertainment purposes. Since thousands of blind people voted to pass the above mentioned resolution at the 1996 convention of the National Federation of the Blind, I am not alone in this opinion.

Respectfully submitted,

Sheila Koeng