

March 23, 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

I am glad to have the opportunity to provide input on the above-titled Notice of Proposed Rulemaking (NPRM) which proposes to mandate use of audio description of visual images by television networks and stations using the Secondary Audio Programming (SAP) channel. As a blind person, I am knowledgeable about this issue and am aware of the negative, direct impact it will have to other blind people and myself. While I support audio description on a voluntary basis, I oppose the imposition of audio description as a federal mandate.

As a member of the National Federation of the Blind (NFB) I voted in favor of a resolution (96-04) passed in 1996 on audio description. This resolution opposes a federal mandate on audio description. Resolutions are voted on by the general membership of the NFB at our National Convention and represent the views of thousands of people across the country. Thus, I know I am not alone in my opposition to the FCC's proposal to mandate audio description of television programming.

Audio description has been discussed on several listservs to which I am subscribed. The primary need for audio description focuses on access to news-related information. More specifically, text that is scrolled across the bottom of the television screen such as emergency weather announcements, school closings, and the text which identifies a speaker or phone numbers are examples of printed material that merit access. The audio description proposed by the FCC is for entertainment purposes. It cannot be justified to mandate audio description by television networks when the blind do not have access to fundamental information.

As blind people, we have fought and continue to fight against economic and employment discrimination. Forcing networks to provide audio description would only reinforce the misconception of the perceived "need to take care of the blind." The production of audio description is very costly and not a need for blind people. People who work for the networks will also see the audio description as another "accommodation" one must provide for a blind person who may be a future applicant seeking employment.

Furthermore, no standards exist for audio description. Often, needless information is verbally described, such as saying a character "walked to the couch" when that has no relevance to the plot, or stating that door slammed when one knows the door closed simply from the sound that is made from this action. In addition to the absence of guidelines for what to describe, the placing of these descriptions are not standardized. At times this causes the audio description to be placed over music and dialogue. Audio description is drastically different from closed-captioning for the deaf where the dialogue can merely be transferred to printed material to be displayed visually.

I urge the FCC to refocus any proposed regulation to address first how the SAP channel and other means should be used to meet the need to provide choice output of emergency, news, and other print displayed information. Only when these fundamental issues are resolved should the FCC turn to the secondary entertainment issues involving audio description.

Respectfully submitted,
Shawn Mayo

