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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 appreciate the opportunity to comment upon the above-titled Notice of Proposed Rulemaking (NPRM) which proposes federally-mandated use of audible description of visual images by television stations and networks via the Second Audio Programming (SAP) channel. I welcome continued development of such descriptive services on a voluntary basis. However, I strongly oppose mandating such services. Such a mandate is largely unnecessary, will prove impractical, at best, to implement and ignores what, for me as a blind person, is of far greater concern: the lack of audible presentation of printed material which appears on the television screen.

I would not quarrel with the statement that "descriptive video" is useful upon occasion. There are certain movies, for instance -- "2001: a Space Odyssey" comes to mind -- that tell their stories so largely through visual effects that without some description or narration, one who cannot see these effects is hard-put to figure out what is going on. Most of the time, however, it is easy for me to figure out what is happening when viewing television programs. Dialogue and sound effects are usually sufficient to accurately infer action and plot. After all, sound cluse and dialogue are some of the principal means by which I, as a blind person, interact with the real world. Extra description is usually not needed. Mandating a service which is not needed places an onerous burden upon the purveyors of television programming -- a burden which would be reflected in increased programming costs -- costs which would not bring commensurate benefits.

Moreover, a mandated descriptive video service will prove difficult, if not impossible, to implement. The necessity for such a mandate is based upon the premise that descriptive video services are analogous to closed-captioning services for the hearing-impaired. This premise is false. Whereas the material displayed via closed-captioning services consists largely of scripted dialogue and is therefore easily and objectively mandated, descriptions of visual images are subjective and are thus not easily susceptible of unambiguous enforcement via rules and regulations. What one blind person deems an adequate description of a scene may be considered woefully wanting by

another blind person -- or vice versa. For example, many of the video descriptions produced by WGBH's "Descriptive Video Service", while appreciated by some blind persons, I consider wordy, overblown and containing superfluous information. I am not interested in costumes, lighting, facial expressions or scenery unless they are directly related to action or plot. After all, these elements are not normally accessible to me in any event -- I have light perception in one eye. Furthermore, excessive descriptions tend to drown out useful sound effects or music which may give clues to what's going on. Yet video description is an all-or-nothing proposition: either one listens to it or one doesn't and one has no control over its content or verbosity. Something this subjective cannot be successfully mandated.

But the fundamental problem with this NPRM is that it does not address the real issue of concern to me and of concern to many, many blind people: the lack of access to printed information displayed on the television screen but not spoken. Emergency information (including weather warnings), identities of talking heads and other speakers in news programs, English subtitled translations of the words of persons speaking in foreign languages, sports scores, addresses and telephone numbers displayed during informational broadcasts and commercials -- all these crawl across our television screens without any means of audible retrieval. For me, one of the most frustrating phrases in the English language is: "Call the number on your screen!" What number? If you try to obtain it from your local television station and the programming wasn't produced locally, you're just plain out of luck! Deprivation of such information is, at the very least, disadvantageous and, at worst, dangerous.

I therefore urge the Federal Communications Commission to abandon this NPRM and to instead institute proceedings to require (whether via the SAP channel or via other means) provision of on-screen printed materials in audible form. After the problems of providing such escription have been solved, then and only then should the Commission endeavor to explore the possibility of requiring audio description of video images by entities providing television programming.

Respectfully submitted,

Michael Freeman