



September 6, 2023

Jessica Rosenworcel
Chair
Federal Communications Commission
45 L Street, NE
Washington, DC 20554

RE: CG Docket Nos. 23-161, 10-213, 03-123

Dear Chair Rosenworcel:

The National Federation of the Blind, the transformative membership and advocacy organization of blind Americans, appreciates the opportunity to comment on the Access to Video Conferencing Proposed Rule. We are pleased to see the Federal Communications Commission publish a proposed rule on this topic.

Video conferencing tools such as Zoom, Microsoft Teams, and Google Meet have become the standard in communication for conferences/conventions, telehealth, education, and even many forms of commerce. The proliferation of video conferencing technology has altered both the pedagogic and corporate landscapes and has permitted organizations to remain operational during crises. However, the students and employees who are blind, low-vision, or deafblind typically report a different user experience than those without visual or auditory impairments. Creating, hosting, or joining a meeting presents multiple accessibility barriers for members of these communities, regardless of which platform and device combination are utilized.

In general, the Federation applauds the accessibility of these platforms but also recognizes that there are still access barriers that limit the full participation of blind people in the use of these tools. Creating, hosting, and joining presents accessibility barriers for members of these communities no matter the platform or device. There are key pieces of visual information that are submitted through screen sharing, staging presentations such as signs and white boards, and the physical description of speakers and participants that the blind, low vision, and deafblind do not get access to. Furthermore, there are control and setting aspects of the conference platform itself that are inaccessible to blind and low-vision users because they are purely visual.

Aira, a provider of visual interpreting, reports that from July 2022 to July 2023, there were over six hundred service calls alone requesting information related to a Zoom platform session. These calls involved requests related to camera presentation, visual information, screen sharing documents, and much more. Aira has also provided data that demonstrates the need for visual information requests related to conferences, telehealth, and education sessions. If the Federal Communications Commission were to require video conferencing services to institute text-to-

speech or compatibility with refreshable Braille displays, as is suggested in the proposed rule, it would go a long way toward ensuring that blind, low-vision, and deafblind Americans are able to privately and independently operate these video conferencing services with the same access as our sighted peers.

The National Federation of the Blind urges the Commission to make effective a rule that will provide greater nonvisual access tools for blind, low vision, and deafblind Americans, and we are ready to provide valuable information and assistance to the Commission as the nation's premier organization of the blind. If there are any questions, or if we can be of assistance in any way, please do not hesitate to contact us.

Sincerely,

A handwritten signature in black ink, appearing to read "Mark A. Riccobono", with a long, sweeping horizontal stroke extending to the right.

Mark A. Riccobono, President
National Federation of the Blind