A logo for a blind company

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March 3, 2025

SUBMITTED ELECTRONICALLY

Chairman Brendan Carr

Federal Communications Commission

45 L Street, NE

Washington, DC 20554

**RE: Joint Reply Comments Concerning the FCC’s Access to Video Conferencing Proposed Rule (CG Docket Nos. 23-161, 10-213, and 3-123)**

Dear Chairman Carr:

The American Council of the Blind (ACB), the American Foundation for the Blind (AFB), and Perkins School for the Blind (Perkins) appreciate the opportunity to reply to comments submitted in response to the Federal Communications Commission’s (FCC) proposed rule on access to interoperable video conferencing services (IVCS). Our organizations collectively represent communities and individuals who are blind, deafblind, or have low vision, and we are united in our missions to ensure that people have equal opportunity to IVCS. We offered our initial comments by letter dated February 3, 2025, and respectfully offer the following additional recommendations.

**FCC Should Not Delay Adoption of Performance Objectives**

One commenter—the Consumer Technology Association—argued that it is “simply premature for the Commission to issue new IVCS regulations.” We disagree. We continue to believe that it is critically important for the FCC to move forward with adopting new performance objectives to enhance accessibility in video conferencing platforms for individuals with disabilities. Video conferencing is an essential communication technology that enables individuals to participate in remote and hybrid professional, civic, educational, and personal arrangements. The FCC’s current performance objectives are not adequate to meet the needs of individuals who utilize assistive devices and technologies to fully participate in video conferencing. Accessibility of video conferencing platforms is not consistent, and while many platforms have accessibility features, others are difficult to navigate for individuals who are blind, deafblind, or have low vision. It is time to amend the performance objectives to advance the goal of accessibility. Moreover, our organizations support technological innovation, and we disagree with any claims that setting performance objectives to encourage accessibility in the industry stifles innovation.

**The FCC Should Amend the Performance Objective to Include the Provision of Audio and Visual Image Description Services**

One commenter—Epic—asserted that the “inclusion of audio descriptions in IVCS does not meaningfully enhance user experience as it might in other settings.” This assertion is factually incorrect and ignores the needs of individuals who are blind, deafblind, or have low vision who utilize assistive technologies and accessibility features to experience visual content and engage with IVCS platforms. Accessibility is not only achievable but should be viewed as fundamental for effective communication. We are disheartened to learn of the position of Epic—a leading provider of health information technology. Audio description is an essential feature for accessibility, especially in the medical context. In the aftermath of the COVID-19 public health emergency, telehealth has become a critical resource and delivery of healthcare services. Patients—including patients who are blind, deafblind, or have low-vision—should have the same rights to access medical information, visual demonstrations, and other essential content via IVCS platforms. Simply put, the inclusion of audio descriptions in IVCS *does* meaningfully enhance user experience. For instance, a healthcare provider may choose to host a webinar about COVID-19 and show participants a brief video that visually demonstrates how to use a test kit. Without audio description support in the IVCS platform, users who cannot see the video will be unable to gather important medical instructions. Accessibility should not be seen as a burden but as an avenue for equal participation in everyday life.

**The FCC Should Not Expand its Current Waivers/Exemption**

In its comments, CTA urged the FCC to provide a “targeted exemptions as with other accessibility rules” and waivers “if complying with a rule is technically infeasible.” We believe that current FCC waivers and exemption provide appropriate flexibility. We do not believe that additional waivers/exemptions are warranted. The FCC should ensure that companies are not exploiting waivers as loopholes to inappropriately delay compliance.

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We commend the FCC for its leadership in addressing accessibility in video conferencing and appreciate the opportunity to provide reply comments. Should you have any questions or require further information, please contact Claire Stanley ([cstanley@acb.org](mailto:cstanley@acb.org)) at ACB, Sarah Malaier ([smalaier@afb.org](mailto:smalaier@afb.org)) at AFB, and Kim Charlson ([Kim.Charlson@perkins.org](mailto:Kim.Charlson@perkins.org)) at Perkins.

Sincerely,

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| Sarah Malaier  Senior Advisor, Public Policy and Research  American Foundation for the Blind | Dave Power  President and Chief Executive Officer  Perkins School for the Blind |
| Kim Charlson, Executive Director  Perkins Braille & Talking Book Library  Perkins School for the Blind | Claire Stanley, JD  Director of Advocacy and Governmental Affairs  American Council of the Blind |