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Kris Monteith

Acting Bureau Chief

Consumer and Governmental Affairs Bureau

Federal Communications Commission

445 12th Street SW

Washington, DC 20554

Re: Reply to the Coalition of E-Reader Manufacturers’ Petition for Waiver from CVAA Accessibility Requirements, CG Docket No. 10-213

Dear Mr. Monteith:

I have been blind since birth. I have a bachelor’s degree in, am licensed as, and have worked in the field of civil engineering for the past 12 years. When asked what I enjoy doing in my spare time, I always include reading. Additionally, this last week I was selected as one of four local employees in my Federal government agency to participate in our Fiscal Year 2014 Leadership Development Program, which will involve substantial reading of books on leadership and management.

I am writing to strongly oppose the Petition for Waiver submitted by the Coalition of E-Reader Manufacturers’, requesting that e-readers be exempt from the Twenty First Century Communications and Video Accessibility Act (CVAA). The spirit of the CVAA is to increase the accessibility of mobile advanced communications services (ACS) and e-readers clearly have ACS functionality. Most e-reader users I know post to Facebook and exchange books with friends. It would not make sense to grant a waiver for a class of products that are clearly intended to be covered by the CVAA.

E-readers can easily be made accessible. All digital content can be made accessible to a blind person if the content is programmed to be read audibly, audio output such as speakers or a phone jack are added, and accessibility is considered during the design phase. The claim that to make e-readers accessible would require a fundamental overhaul of the equipment is false, as demonstrated by such products as those made by Apple.

I want access to digital books. Since the first e-reader came out in 2006, I have felt like a second class citizen missing out on all of the innovative benefits of digital books. If I want to read a Kindle book, I have to buy a very-expensive Apple iPad—which IPad, as I stated above, is accessible because accessibility was considered in its design. Then I can download the free Kindle app, but that application is not fully accessible. I want to be a mainstream user and would happily buy an e-reader if one was accessible, but the manufacturers continue to exclude me from their customer pool. I reject the Coalition’s notion that to make their product accessible would not provide me with any substantial benefits. In reality, it will give me options as a consumer and equal access as my sighted peers.

The Coalition suggests that the waiver only apply to e-readers that do not have ACS capabilities, but then says that the products may have browsers and social media. This is entirely inconsistent on its very face. Finally, the Coalition fails to provide any details on the lifecycle of its products or a potential time frame for the waiver. An indefinite, blanket waiver would harm the public, is inconsistent with the CVAA, and should not be granted in light of these omissions.

I have occasionally told co-workers and friends about the story my brother-in-law told my wife and me and me about his toddler son (my wife and my godson) reading out of a hard copy book. Our nephew and godson avidly uses his parents’ IPads to read childrens’ books. When he was reading the hard copy book, he slid his fingers along the top of the page to go to the next one. Of course, that did not turn the hard copy page, and he exclaimed, “It’s broken!” It brings me great sadness that while I can share with him reading hard copy books, I cannot now, and the Coalition doesn’t think it important that I be able to, share reading with him in this 21st century medium (such as by using a Bluetooth refreshable display with an E-reader in the same way I can with an IPad).

I strongly urge the FCC to reject the Coalition’s petition and uphold the spirit of the CVAA. E-readers and the ACS features found in that equipment must be made accessible, and granting a waiver would perpetuate the digital divide and discrimination, some quite personal, in the marketplace that I face every day.

Sincerely,

Nathanael T. Wales