



expensive to make products and services accessible when products and services are designed with access in mind. The Commission's own report and order implementing Section 255 of the Telecommunications Act recognizes this approach. Because the marketplace has typically failed to respond to the need for video description, it is a logical extension of the access approach taken in the Section 255 report and order for the FCC to similarly require disability access to digital streams and to the various applications provided within these streams.

Because such a set-aside takes advantage of digital technology's capability to offer multiple channels of audio, with significantly greater bandwidth, vide description can be easily and inexpensively accommodated.

We have applauded the Commission and industries involved for their efforts in reaching agreements on Technical Standards for Digital Television (MM Docket No.87-268) and have recommended in our filed comments on this proceeding that the standard should contain a specific requirement to designate audio bandwidth capacity for the purpose of delivering video descriptions. We note that the ATSC recommended standard provides for vision-impaired services (video description) but does not require the designation of audio bandwidth for this important purpose.

In order to assure Americans who are blind or visually impaired of equal access to video programming, a consistent, reliable and mandatory audio standard and set-side of bandwidth is required. If video description is subjected to multiple and ill-defined formats, determined through market competition, costs to consumers and providers will be prohibitive and access will be seriously hindered.

We are also concerned that, without such a requirement, bandwidth, which seems so abundant at the dawn of the digital age, will quickly be reserved for other purposes and will not be available as a means of providing equal access for people who are blind or have other disabilities to the abundant information and entertainment available through video programs.

We also urge the Commission to take steps to ensure that manufacturers of digital TV receivers are required to support simultaneous multi-channel audio-decoding capability so descriptions can be delivered separately from a program's main audio. Otherwise, the audio description channel will require greater bandwidth since it will have to include the main program audio as well. This dual decoding capability must be ensured throughout the full line of a manufacturer's TV sets, not merely in the "high-end" sets. Dual decoding will also make the description process much cheaper because professional audio mixing sessions will not be necessary.

We conclude by reminding the Commission of our statement in response to MM Docket 99-339 (In the Matter of Video Description of Video Programming) in which we stated: "Media is the language of our time, and those who are not fluent risk isolation, even virtual exclusion from their own culture as that culture becomes

even more dependent upon visual media."

Respectfully Submitted,

The American Foundation for the Blind  
Alan M. Dinsmore  
Senior Governmental Relations Representative  
820 First Street, N.E., Suite 400  
Washington, D.C. 20002  
202-408-8171  
adinsmore@afb.net