



proposals and provides feedback on how the Commission can implement each of them in a manner that is manageable and promotes a broad range of participation.

TIA is the leading trade association for the information and communications technology (“ICT”) industry, representing companies that manufacture or supply the products and services used in global communications across all technology platforms. TIA represents its members on the full range of public policy issues affecting the ICT industry and forges consensus on industry standards. Among their numerous lines of business, TIA member companies design, produce, and deploy a wide variety of devices with the goal of making technology accessible to all Americans – an objective we share with the Commission. TIA has been actively involved in the Commission’s efforts to eliminate barriers to communications technology by people with disabilities and looks forward to continuing this discussion.

**I. THE ONLINE CLEARINGHOUSE SHOULD ACT AS A PORTAL TO DIRECT CONSUMERS TO CURRENTLY AVAILABLE ACCESSIBLE TECHNOLOGIES**

**a. TIA supports the creation of a voluntary information clearinghouse of currently available accessible technologies, to be maintained on an accessible website.**

TIA supports the Online Clearinghouse proposed by the Commission to act as a tool to facilitate information between consumers and suppliers of accessible technology products and services and assistive technologies.<sup>1</sup> As the Commission has aptly recognized, one problem that consumers with disabilities face is that they are unable to find accessible communications technologies and assistive technologies. In many cases accessible products and services that will meet the consumer’s need already exist in the

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<sup>1</sup> Comments of the Telecommunications Industry Association (“TIA”), *In the Matter of a National Broadband Plan for Our Future*, GN Docket No. 09-51, filed Sep. 15, 2009, at 10.

marketplace but the consumer simply may not be aware or available information may be fragmented. Assembling this information into one place will act as a bridge to the information gap between consumers and vendors of accessible products and services. The site itself should be accessible by meeting Web Content Accessibility Guidelines (WCAG 2.0), which are recommendations from the W3C on how to make Web content accessible to people with disabilities.

Since the clearinghouse is voluntary in nature, TIA suggests that Commission implement a structure that is scalable and manageable to encourage as many participants as possible. When launching the site, the Commission should structure it as an information portal that would include links to the websites of manufacturers, service providers, and other potential participants, which may include retailers of accessible technology products. Since the majority of manufacturers devote a portion of their websites to accessibility,<sup>2</sup> this would be more efficient and eliminate a potential impediment of duplicative responsibilities. Further, it would incite participants to maintain and improve their current sites and ensure that the Commission's website is just as accurate as the information on a manufacturer or service provider's website.

**b. TIA suggests the Commission launch the Clearinghouse in a three-step process**

TIA proposes that the Commission launch the Clearinghouse in a three-step process. Gradual implementation of the Clearinghouse will heighten its chances of success by allowing the Commission to address potential technical and logistical problems at an early stage. It will also give the Commission the opportunity to solicit

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<sup>2</sup> See [www.microsoft.com/enable](http://www.microsoft.com/enable), [http://na.blackberry.com/support/devices/blackberry\\_accessibility/](http://na.blackberry.com/support/devices/blackberry_accessibility/), <http://www.panasonic.com/accessibility/>, <http://www.nokiaaccessibility.com/>, <http://direct.motorola.com/ens/accessibility/default.html>

feedback from the public and participants to improve the site before moving on to the next step.

TIA recommends that the Commission consider the following three steps for implementation. First, the Commission should launch the Clearinghouse in the form of an informational portal with links to existing websites, as described above. Second, the Commission could add information about assistive technology (AT), including links to AT company's sites and resources on AT programs, such as state AT programs and Assistive Technology Learning Centers. Third, the Commission could administer an online survey on a monthly basis that would ask a question related to accessible technology. TIA urges the Commission to seek public comment before each step or anytime a substantial change to the Clearinghouse is considered.

**c. Any potential blog component of the website should be separate from the informational clearinghouse.**

A blog or some other open forum for discussion on accessible technology would be useful not only to the Commission but also to industry to identify gaps in the marketplace. However, if the Commission does establish a blog, it should be maintained in an area that is separate and independent from informational links to products and services. Although the Commission has already denoted the voluntary nature of the Clearinghouse, the Commission should clarify that comments made on the blog do not establish affirmative requirements for industry and that regulatory requirements are not linked to blog postings. Further, due to the voluntary nature of the clearinghouse, the Commission should clarify that industry is neither obligated to monitor and respond to postings nor required to make changes to products or services based on the blog.

## **II. TIA RECOMMENDS THAT AN AWARD SHOULD ENCOURAGE POSITIVE ONGOING INNOVATION**

The Commission proposes the creation of an annual Chairman's Award for Accessibility and Innovation to recognize innovations "that have made the greatest contribution to advancing broadband accessibility" and seeks comment on how to structure such an award. TIA supports the recognition of the many creative and innovative developments in the accessible technology arena. A Chairman's Award would bring awareness to the needs of persons with disabilities and encourage innovators to research and develop innovative uses for technology that could provide solutions to these needs. TIA recommends that any such award should focus on on-going innovations, rather than focusing on problems to be solved. By focusing on the solutions rather than the problems, the award will be more positive and productive and encourage participation from a broader community. The criteria for the Chairman's Award should be posted to the web site so that manufacturers, service providers, other related vendors, and all potential awardees would understand how they might be judged.

## **III. ONGOING WORKSHOPS, FIELD EVENTS, AND FACILITATED DIALOGUES SHOULD BE USED TO PROMOTE INNOVATIVE ACCESSIBILITY SOLUTIONS**

TIA commends the Commission for initiating the discussion on technology and policy barriers surrounding accessible technology through workshops, discussions, tech fairs, and public comment. TIA encourages the Commission to continue using a wide variety of mechanisms to further the discussion and seek input from all stakeholders. These events should be designed to maximize participation from all interested parties. While the policy discussions in Washington, D.C. will always play an integral role in reducing barriers to accessible technology, the Commission would gain valuable input by

holding field events or facilitated dialogues “outside the beltway.” The Commission should consider conducting these events at pertinent trade shows and conventions.<sup>3</sup> This would result in a wider range of participants beyond policy makers, such as engineers, application developers, representatives of the Assistive Technology industry, and members of the disability community.

In order to provide specific topics for discussion, TIA suggests that the Commission to more distinctly delineate its goals. This would allow commenters to provide concrete, detailed suggestions as to how to frame the debate to solicit the most useful discussion. Regardless of the issue, TIA strongly encourages the Commission to separate these discussion topics from any ongoing rulemaking procedures. This will facilitate greater participation and allow participants to express their views more openly without liability concerns. Further, the Commission should expand the scope of discussion beyond policy issues to incorporate technical and consumer issues.

## **CONCLUSION**

TIA commends the Commission’s attention to these important issues and appreciates the opportunity to comment. We look forward to continuing our work with the Commission on achieving universal broadband accessibility by all Americans through the implementation of the creative ideas proposed by the Commission.

Respectfully submitted,

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<sup>3</sup> The Commission could collocate accessibility dialogues, field events, and workshops at trade shows and conventions hosted by the Telecommunications Industry Association, Consumer Electronics Association (CEA), National Cable and Telecommunications Association (NCTA), Assistive Technology Industry Association (ATIA), California State University Northridge (CSUN), and the Hearing Loss Association of America (HLAA).

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June 10, 2010