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March 20, 2017

*via email to PRA@fcc.gov and Cathy.Williams@fcc.gov*

Cathy Williams  
Federal Communications Commission  
445 12th Street SW  
Washington, DC 20554

Re: Paperwork Reduction Act Comments

**OMB Control Number 3060-1203**

User Interfaces Provided by Digital Apparatus; Video Programming Guides and Menus Provided by Navigation Devices; Complaint Procedures for User Interfaces, Menus and Guides, and Activating Accessibility Features on Digital Apparatus and Navigation Devices

**OMB Control Number 3060-0874**

Consumer Complaint Portal: General Complaints, Obscenity or Indecency Complaints, Complaints under the Telephone Consumer Protection Act, Slamming Complaints, RDAs and Communications Accessibility Complaints

Dear Ms. Williams:

Telecommunications for the Deaf and Hard of Hearing, Inc. (TDI), National Association of the Deaf (NAD), Association of Late-Deafened Adults (ALDA), Cerebral Palsy and Deaf Organization (CPADO), Deaf Seniors of America, California Coalition of Agencies Serving the Deaf and Hard of Hearing (CCASDHH), National Association of State Agencies of the Deaf and Hard of Hearing (NASADHH), Deaf and Hard of Hearing Consumer Advocacy Network (DHHCAN), and Rehabilitation Engineering Research Center on Technology for the

\* Admitted to the bars of New York and New Jersey. Supervised by a member of the DC bar.

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Deaf and Hard of Hearing, Gallaudet University (DHH-RERC), respectfully support the Federal Communication Commission's ("Commission") continued collection of information relating to the accessibility of user interfaces, guides, and menus of digital apparatuses and navigation devices, described in the Information Collection notice regarding the above-referenced OMB control numbers, published at 82 Fed. Reg. 4877 (Jan. 17, 2017).

The continued collection of this information is critical for the Commission to fulfill its duty of ensuring the civil right of people who are deaf or hard of hearing to access programming on video devices made available by manufacturers and multichannel video programming distributors, as directed by Congress in the Twenty-First Century Communications and Video Accessibility Act ("CVAA") and other legislation.

In particular, the above-referenced Information Collection notice proposes modifying its online consumer complaint portal to include the collection of complaint information related to the FCC's accessibility requirements for video programming digital apparatus and navigation device user interfaces (e.g., TV and set-top box controls, menus, and program guides). We support enabling consumers to file complaints regarding these user interfaces through the Commission's streamlined online portal, and believe that such collections are consistent with the spirit and letter of the Paperwork Reduction Act and have tremendous practical utility. It is important that the FCC continue to ensure that consumers who are deaf, hard of hearing, late-deafened, deafblind, or have other disabilities face a minimal burden when they seek to provide this vital information to the Commission regarding their ability to access communications services and devices.

Jack O'Gorman  
Georgetown Law Student

Respectfully submitted,  
/s/ Drew Simshaw  
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*Counsel to TDI*

**Telecommunications for the Deaf and Hard of Hearing, Inc. (TDI)**

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**National Association of the Deaf (NAD)**

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**Association of Late-Deafened Adults (ALDA)**

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**Cerebral Palsy and Deaf Organization (CPADO)**

Mark Hill, President • president@cpado.org  
1219 NE 6th Street, Apt. #219, Gresham, OR 97030  
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www.cpado.org

**Deaf Seniors of America**

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**California Coalition of Agencies Serving the  
Deaf and Hard of Hearing (CCASDHH)**

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**National Association of State Agencies of the  
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**Deaf and Hard of Hearing Consumer Advocacy Network (DHHCAN)**

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**Rehabilitation Engineering Research Center on Technology for the Deaf and Hard  
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