



**American Council
of the Blind**
Together for a bright future

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Wireless Bureau
Federal Communications Commission
445 12th Street SW
Washington, DC 20554

RE: Public Notice Comments on Verizon Acquiring Control of Tracfone Wireless (ITC-T/C-20200930-00173)

The American Council of the Blind thanks the Federal Communications Commission for the opportunity to comment on the Commission's Public Notice for the Verizon acquisition of Tracfone Wireless. For ten years, ACB has collaborated with the Commission to implement the 21st Century Communications and Video Accessibility Act (CVAA), and it is through this lens that we believe the Verizon acquisition of Tracfone Wireless provides great opportunity to enhance the public interest through increasing the accessibility of wireless handsets for consumers.

ACB is a leading national grassroots consumer-based advocacy group for Americans who are blind and visually impaired. Comprised of more than 65 state and special-interest affiliates, the American Council of the Blind strives to increase the independence, security, equality of opportunity, and to improve quality of life for all blind and visually impaired people.

During the COVID-19 pandemic, accessible communications has become more critical than ever. Social distancing and stay-at-home orders have left many people with disabilities, especially people who are blind and experiencing vision loss, feeling abandoned and isolated from family, friends and society as a whole. Smartphones with native accessibility features are a vital lifeline for people with disabilities to bridge the social distance and remain connected. However, whether due to socio-economic barriers, lack of comfort with new technologies, or consumer choice, many people who are blind or experiencing vision loss rely on the familiarity and comfort of basic and feature phones with limited or no Internet connectivity.

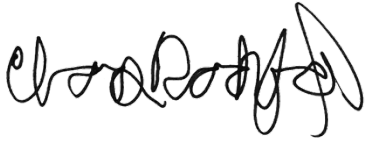
As stated in the FCC's 2020 CVAA Biennial Report to Congress, basic and feature phones are becoming less accessible to people who are blind or experiencing vision loss. The 2016 CVAA Biennial Report to Congress highlighted the market possessed several basic and feature phone options that provided "audible everything that appears on the screen, buttons that are pressed, caller identification, and battery status;" however, the record showed no such devices in 2020.¹ It is for these reasons, ACB urges the Commission to consider the accessibility of wireless handsets, especially basic and feature phones, as part of the public interest for this acquisition application.

ACB thanks the Commission for the opportunity to provide comments on the Public Notice for the Verizon acquisition of Tracfone. As a nationwide consumer organization, ACB remains committed to ensuring wireless devices are accessible and usable for consumers, and to this end, we stand ready to

¹ "2020 Biennial Report To Congress As Required By The Twenty-First Century Communications and Video Accessibility Act." 35 FCC Rcd 11227 (14).

assist wireless providers, equipment manufacturers, and the Commission to return accessible basic and feature phones to the market. If the Commission has any questions regarding these comments, or how this acquisition may serve the public interest for all consumers, including consumers who are blind or experiencing vision loss, please feel free to contact Clark Rachfal: crachfal@acb.org, (202) 467-5081.

Sincerely,

A handwritten signature in black ink, appearing to read 'Clark Rachfal', written in a cursive style.

Clark Rachfal
Director of Advocacy and Governmental Affairs