



December 18, 2020

Ajit Pai
Chairman
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

RE: ITC-T/C-20200930-00173

Dear Chairman Pai:

The National Federation of the Blind appreciates the opportunity to comment regarding the transfer of control for TracFone Wireless, Inc. from América Móvil, S.A.B. de C.V. to Verizon Communications, Inc.

In the most recent filing of the biennial report required by the Twenty-First Century Communications and Video Accessibility Act of 2010, the Federal Communications Commission (FCC) reported that “gaps continue to exist with respect to (1) the availability of accessible mobile phones with low-end features, functions, and prices (feature phones) for people who are blind and (2) certain apps that provide telecommunications and advanced communications services that were not readable by screen readers.”¹ It was also noted by the FCC that “feature phones are used with wireless services and include (1) phones used primarily or exclusively for voice communications, and (2) phones used for voice communications and text messaging, with little or no computing capabilities. The record does not identify a feature phone that is accessible to people who are blind.”²

Furthermore, it was reported by CTIA — The Wireless Association that the wireless industry “continues to close identified gaps in accessibility. Although progress has been made in offering various models of feature phones with features accessible to users such as senior citizens and people with certain disabilities, including individuals with low vision, it appears that feature phones that are accessible to blind users (and that were mentioned in the 2016 Biennial Report) are no longer available. As a result, blind users appear to be no longer able to use all the functions on these types of phones, such as caller ID and other text-based functions that appear on a feature phone’s screen.”³ In the 2020 biennial report, the FCC also noted a lapse of accessibility in apps and software upgrades. The FCC report further states that the Commission “found instances where telecommunications, email, and text messaging services provided over apps and websites

¹ Federal Communications Commission. “Biennial Report to Congress as Required by the Twenty-First Century Communications and Video Accessibility Act of 2010.” October 7, 2020. P. 8.

² Ibid, p. 8.

³ Ibid, p. 8.

were not accessible to screen readers. In a few Requests for Dispute Assistance, screen readers were unable to read the inaccessible websites of telecommunications services providers where customers pay their bills and adjust their voicemail settings through customer portals. We also note that accessibility options that existed in previous versions have been lost due to updates to some operating systems and some telecommunications and advanced communications apps.”⁴

The National Federation of the Blind is greatly concerned with CTIA’s findings regarding feature phones. We fear that this current trend of diminishing accessibility will continue, and that blind consumers will be forgotten. Given that Verizon Communications is one of the largest companies in the mobile phone industry, and that TracFone Wireless is a leader in the utilization of feature phones, we urge that a stipulation be introduced in the acquisition agreement. This stipulation should mandate Verizon Communications to make accessible any mobile devices scheduled for release following the acquisition. The National Federation of the Blind also offers its assistance to the FCC and/or Verizon should there be questions about accessibility for mobile devices.

Sincerely,

A handwritten signature in black ink, appearing to read "Mark A. Riccobono", with a long, sweeping horizontal line extending to the right.

Mark A. Riccobono, President
National Federation of the Blind

⁴ Ibid, p. 9.