



March 02, 2021

Jessica Rosenworcel
Acting Chair
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

RE: ITC-T/C-20200930-00173, Ex parte communications 2/26/2021

Dear Chairwoman Rosenworcel:

On Friday, February 26, 2021, representatives from the National Federation of the Blind and the Federal Communications Commission conducted a conference call to discuss the Verizon Communications, Inc. acquisition of TracFone Wireless, Inc. The people present for the call were:

From the National Federation of the Blind:

John Pare, Executive Director for Advocacy and Policy
Everette Bacon, Member of the NFB Board of Directors and Member of the FCC Disability Advisory Committee

From the Federal Communications Commission:

Charles Mathias, Wireless Telecommunications Bureau
Garnet Hanly, Wireless Telecommunications Bureau
Stacy Ferraro, Wireless Telecommunications Bureau
Jessica Quinley, Wireless Telecommunications Bureau
Giulia McHenry, Office of Economics and Analytics
Don Stockdale, Office of Economics and Analytics
Glenn Woroch, Office of Economics and Analytics
Nick Copeland, Office of Economics and Analytics
Aleks Yankelevich, Office of Economics and Analytics
Joel Rabinovitz, Office of General Counsel

As the National Federation of the Blind noted in our comments dated December 18, 2020, quoting a 2020 FCC report: "gaps continue to exist with respect to ... the availability of accessible mobile phones with low-end features, functions, and prices (feature phones) for people who are blind."¹ Additionally, the report states "that feature phones that are accessible to blind users (and that

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.

were mentioned in the 2016 Biennial Report) are no longer available.”² This is a startling indication that not only are “accessible mobile phones with low-end features, functions, and prices” difficult to find, but that they are becoming more rare as time goes on. As technology improves and makes everyday tools, like mobile phones, increasingly accessible the availability and affordability of these devices should increase as well.

According to the 2018 American Community Survey conducted by the US Census Bureau, there are more than 7.5 million people in the United States who self-identity as having a visual disability.³ Furthermore, it is important to note that according to the Census Bureau 69.1 percent of all working age people who self-identity as having a visual disability are either unemployed or underemployed.⁴

These statistics clearly demonstrate the need for accessible mobile phones with low-end features, functions, and prices. For that reason, the National Federation of the Blind reiterates our statement from December 2020 that Verizon’s acquisition of TracFone be approved only if Verizon be required to make accessible any mobile devices scheduled for release following the acquisition.

Sincerely,

A handwritten signature in black ink, appearing to read "John Paré", enclosed within a thin black rectangular border.

John G. Paré Jr.
Executive Director for Advocacy and Policy
National Federation of the Blind

² Ibid, p. 8.

³ United States Census Bureau, American Community Survey. “The number of non-institutionalized, male or female, all ages, all races, regardless of ethnicity, with all education levels in the United States reported a visual disability in 2018.” Compiled by Cornell University. <https://www.disabilitystatistics.org/reports/acs.cfm?statistic=1>.

⁴ United States Census Bureau, American Community Survey. “The percentage of non-institutionalized persons aged 21-64 years with a visual disability in the United States who were employed full-time/full-year in 2018.” Compiled by Cornell University. <https://www.disabilitystatistics.org/reports/acs.cfm?statistic=4>.