

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554**

In the Matter of)
)
Video Description: Implementation of the) MB Docket No. 11-43
Twenty-First Century Communications and)
Video Accessibility Act of 2010)

**REPLY COMMENTS OF
THE NATIONAL ASSOCIATION OF BROADCASTERS**

Based on the initial round of comments, the National Association of Broadcasters (NAB)¹ does not object to the Commission’s proposal to expand coverage of the audio description rules to network affiliate television stations nationwide.² We agree with the Commission’s goal of improving the accessibility of televised programming for a greater number of individuals who are blind or visually impaired, and believe the FCC’s proposed schedule for extending the audio description obligations from the currently required top 100 designated market areas (DMAs) to all 210 DMAs is reasonable.³

As noted by the Commission, the Twenty-First Century Communications and Video Accessibility Act of 2010 (CVAA) limits its authority to phase-in the audio description rules in up to an additional ten DMAs each year.⁴ Thus, audio described programming will not be mandated in some markets for an extended period of time. NAB agrees with the American Council of the Blind and the American Foundation for the Blind regarding the consumer

¹ NAB is a nonprofit trade association that advocates on behalf of local radio and television stations and broadcast networks before Congress, the Federal Communications Commission and other federal agencies, and the courts.

² *Video Description: Implementation of the Twenty-First Century Communications and Video Accessibility Act of 2010*, Further Notice of Proposed Rulemaking, FCC 23-20 (Mar. 17, 2023) (Further Notice).

³ *Id.* at ¶¶ 1 and 13.

⁴ Pub. L. No. 111-260, § 202(a); 47 U.S.C. § 613(f)(4)(C)(iv).

benefits of audio description, and shares their goal to bring those benefits to more individuals as quickly as possible.⁵ Accordingly, NAB will heed the disability community's requests to encourage television stations in markets outside the top 100 DMAs to implement audio description earlier than the FCC may require in accordance with the CVAA.

NAB appreciates the opportunity to comment on this proposal, which will help ensure that more blind or visually impaired individuals can access and enjoy television programming.⁶

Respectfully submitted,

Handwritten signature in black ink, appearing to read "Rick Kaplan" and "Larry Walke".

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⁵ Comments of the American Council of the Blind (ACB) at 2, MB Docket No. 11-43 (Apr. 28, 2023); Comments of the American Foundation for the Blind (AFB) at 4, MB Docket No. 11-43 (Apr. 28, 2023).

⁶ Further Notice at ¶ 1.