

**Before the
Federal Communications Commission
Washington, DC**

Statement of the American Council of the Blind and the American Foundation for the Blind to the FCC's Hurricane Katrina Independent Panel

May 3, 2006

The American Council of the Blind and the American Foundation for the Blind are pleased to have this opportunity to submit comments to the Federal Communications Commission (FCC) Independent Panel Reviewing the Impact of Hurricane Katrina (Katrina Panel) on the telecommunications and media infrastructure in the areas affected by the Hurricane.

The American Council of the Blind (ACB) is one of the leading national organizations of and for people who are blind and visually impaired. ACB consists of tens of thousands of members and more than 70 affiliates across the United States. ACB is dedicated to improving the quality of life, equality of opportunity and independence of all people who have visual impairments. Its members and affiliated organizations have a long history of commitment to the advancement of policies and programs which will enhance the accessibility and safety for individuals who are blind and visually impaired.

The American Foundation for the Blind (AFB) is a national nonprofit that expands possibilities for people with vision loss. AFB's priorities include broadening access to technology; elevating the quality of information and tools for professionals who serve people with vision loss; and promoting independent and healthy living for people with vision loss by providing them and their families with relevant and timely resources. AFB is also proud to house the Helen Keller Archives and honor the over forty years that Helen Keller worked tirelessly with AFB. For more information visit us online at www.afb.org.

Hurricane Katrina's Impact on Persons with Vision Loss

Among those citizens hardest hit by this disaster were persons with vision loss including citizens who are deaf-blind. The state by state totals for the non-institutionalized population of person with vision loss are: Alabama 136,730, Louisiana 135,710, and Mississippi 87,630.¹ The estimated number of children and adults who are deaf-blind are: Alabama 354, Louisiana 511, and Mississippi 144.²

We appreciate that the work of the Katrina Panel is focused on establishing recommendations to the FCC regarding ways to improve preparedness, network reliability, and communications among first responders such as firefighters and emergency medical personnel. However, we remind the Katrina Panel that the end result of your recommendations should be to the establishment of procedures which will allow government and media to communicate emergency

¹ National Health Interview Survey-Disability Supplement, non-institutionalized population 1994-1995. Center for Health Statistics, Centers for Disease Control and Prevention. Estimates are derived from this data and the rate is then applied to the current 2005 census population estimates.

² Helen Keller National Center for Deaf Blind Youths and Adults Registry

and public safety information to the broadest possible range of the affected population before, during, and in the long aftermath of disasters like Katrina. Therefore, while a critical task will be determining procedures to enhance communications network reliability, the Katrina Panel must keep in mind that the most important objective of such reliability is to ensure the safety of all citizens.

For people with vision loss, especially those who have other significant disabilities such as hearing loss, the provision of reliable, accessible information in usable formats before, during, and after natural disasters is critical to health, safety, and the resumption of a normal life. Of course this is true for all citizens in the affected areas. However, there are critical distinctions regarding the needs of people with vision loss that need to be kept in mind. Citizens usually try to verify information from other available sources before making decisions in an emergency. Other sources may include switching from television to radio or checking other sources on those outlets. When no other source is available, it is possible, though not always safe, to simply look around the neighborhood to determine the extent of damage.

These alternate forms for assessing safety are not available to people with vision loss experiencing natural disasters, they cannot “shop” other sources for verification. If broadcast radio is down, televised emergency information typically features inaccessible crawls and scrolls of critical information. The telephone, often the most user friendly source of information, may either be out of service, or in the case of areas affected by Katrina, may be overburdened and unable to provide connections. Evacuees in shelters were sometimes confronted with emergency telephone banks with inaccessible visual menus required to access the systems. The simplest of actions, walking out of the front door to assess the neighborhood damage, can be dangerous. Even the most skilled white cane user or dog guide user will encounter loss of landmarks formerly used for orientation and safe navigation.

For those with disabilities including vision loss the dangers were even more serious. Many were simply unable to evacuate. Those who could were often separated from assistive technology they needed to communicate, separated from service animals that were not allowed on evacuation transport, separated from or had lost the drugs they rely on for diabetes and other chronic disabilities and challenged to attempt to get information from inaccessible communications systems.

Recommendations for Systems Change

AFB was proud to be part of the deliberations of the Public Communications and Safety Working Group of the Media Security and Reliability Council, a Federal Advisory Committee to the Commission. We encourage the Katrina Panel to review the documents of this panel because we believe the recommendations can enrich and focus the work of the Katrina Panel. AFB strongly believes that the work of the Katrina Panel should not be confined to analysis of the performance of communications networks and recommendations for hierarchical sorting out of tasks to make the present system operate more effectively. Certainly the present warning systems need to be analyzed for strengths and modified for the future. However, Media Security and Reliability Council provides the most concise case statement for moving beyond plans for re

establishing the operation of the present broadcast and telecommunications emergency information management system.

Our report and recommendations are concise because we have avoided excessively Scrutinizing and analyzing past results – we cannot alter past performance. Instead we have focused on what can be done today and improved upon in the future.³

If the present system for distributing emergency information is simply enhanced by improvements to the management of restoration of services, the emergency information system will continue to fall well short of the standards so well outlined by the Partnership for Public Warning.

Our national warning capability needs to be focused on the people at risk at any Location and at any hour, be universally accessible, safe, easy to use, resilient, reliable, and timely.⁴

The present management system does not meet this standard. A snapshot of just one element of the system, albeit a very significant element, makes a compelling case for change.

States, counties and municipalities have developed disparate alert networks at a cost of hundreds of millions of dollars; these networks are not particularly effective, are not interoperable, and will be difficult to consolidate.⁵

The nation's broadcast networks are not configured to undertake emergency alerts as a primary task. This is not to say that they are ineffective. Ample evidence has been presented to the Katrina Panel documenting the heroic efforts of network facility operators and equipment suppliers to return their systems to operation. In addition they made critical decisions, often on an ad hoc basis, regarding the types of information that needed to be broadcast and geographic targeting for that information which significantly enhanced citizen's chances for survival. However, it is still not a system. And as long as the FCC continues to attempt to regulate the provision of emergency information on the basis of legacy standards applied to entities that do not have the provision of emergency information as a primary goal, we will not have a system that meets the primary goal outlined by the Partnership for Public Warning.

Recommendation: The Katrina Panel should recommend that the FCC regulate in the matter of the Emergency Alert System. In August of 2004 the Commission published a notice for public comment (EB Docket No. 04-296) containing several questions regarding the utility of this system in local, and national emergencies and its overall effectiveness. AFB provided comments to this docket that outline several issues which should also be examined by this panel

³ Interim Report Public Communications and Safety Working Group, Media Security and Reliability Council, May 16, 2003

⁴ A National Strategy For Integrated Public Warning Policy and Capability, Partnership for Public Warning May 16, 2003

⁵ *ibid.*

(we will provide a link to our comments). Until a major overhaul occurs, the EAS remains as a significant part of the nation's warning system.

Recommendation: The Katrina Panel should ask that the Commission review its current standards for access to emergency information by people with vision loss to provide explicit regulation for video description of emergency information. During emergencies, critical information is graphically portrayed, scrolled, or crawled on the television screen. The following are examples of information which is often referred to as “on your screen” and not reliably voiced by the announcer:

- Designation and current status of recommended evacuation routes
- Emergency telephone numbers
- Designation of areas under alert for evacuation

This is not an exhaustive list.

Recommendation: Incorporate the Common Alerting Protocol (CAP) into the emergency regulatory structure. Adoption of CAP's standards, currently under development by the Organization for the Advancement of Structured Information Standards, an international non-profit standards setting consortium (www.oasis-open.org) can provide the flexibility to incorporate information delivered in accessible and usable formats through multiple devices in all available information channels.

Recommendation: People with disabilities including sensory disabilities should be included in planning for and addressing the process of reconstructing our Nation's emergency information management system and local emergency information management systems. Their needs are not well served, in fact often not served at all, when they are addressed as separate issues.

We look forward to working with the Katrina Panel as you craft your recommendations. Please do not hesitate to contact us for further information.

Respectfully Submitted,

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