



April 16, 2018

Ex Parte Notice

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

**RE: Accessibility of User Interfaces, and Video Programming Guides and Menus
MB Docket No. 12-108**

Dear Ms. Dortch:

On Thursday, April 12, 2018 the undersigned with NTCA–The Rural Broadband Association (“NTCA”) and Bill Durdach with WTA – Advocates for Rural Broadband (“the Rural Associations”) met with Martha Heller, Chief of the Media Bureau Policy Division, Karen Peltz Strauss, Deputy Bureau Chief of the Consumer and Government Affairs Bureau, Suzanne Singleton, Chief of the Disability Rights Division of the Consumer and Governmental Affairs Bureau, Maria Mullarkey, Policy Division Assistant Division Chief, Mary Beth Murphy of the Media Bureau, and Will Schell and Rosaline Crawford with the Disability Rights Division of the Consumer and Governmental Affairs Bureau to discuss matters in the above-referenced proceedings.

The Rural Associations reviewed the technology available to their members with respect to compliance with the Twenty-First Century Communications and Video Accessibility Act of 2010 (“CVAA”) talking guide requirement.¹ The Rural Associations noted that, as was made clear in response to the Public Notice released by the Media Bureau in September 2017,² the marketplace for accessible user guides and menus did not develop as the Commission anticipated.³ As a result, small Multichannel Video Programming Distributors (“MVPDs”) will not be able to avail themselves of the accessible user interface technology utilized by larger operators. The Rural Associations reviewed the options available for compliance for various classes of small MVPDs, and then discussed the potential for relief for those not able to comply.

¹ *Accessibility of User Interfaces, and Video Programming Guides and Menus; Accessible Emergency Information, and Apparatus Requirements for Emergency Information and Video Description: Implementation of the TwentyFirst Century Communications and Video Accessibility Act of 2010, Report and Order and Further Notice of Proposed Rulemaking*, 28 FCC Red 17330 (2013) (“Accessible User Interfaces Order”).

² Media Bureau Seeks Comment on December 20, 2018 Accessible User Interfaces Deadline for Mid-Sized and Smaller MVPDs, Public Notice, MB Docket No. 12-108, DA 17-946 (rel. September 28, 2017).

³ See Comments of the American Cable Association, MB Docket No. 12-108 (fil. Oct. 30, 2017), p. 12; Reply comments of WTA, MB Docket No. 12-108 (fil. Oct. 30, 2017), pp. 2-4.

Thank you for your attention to this correspondence. Pursuant to Section 1.1206 of the Commission's rules, a copy of this letter is being filed via ECFS.

Sincerely,

/s/ Brian Ford

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