



March 19, 2020

Rick Kaplan, General Counsel and Executive Vice President, Legal and Regulatory Affairs  
Larry Walke, Associate General Counsel  
Kelly Williams, Vice President, Engineering and Technology Policy  
National Association of Broadcasters  
1771 N Street, NW  
Washington, DC 20036

Dear Mr. Kaplan, Mr. Walke, and Mr. Williams:

The National Association of the Deaf asks the National Association of Broadcasters to work with us to ensure that, during these challenging times with the coronavirus pandemic, all public briefings and press conferences relating by government and public health officials are fully accessible to deaf and hard of hearing people in this country. We have received numerous calls and emails from deaf and hard of hearing people who are unable to understand what is being broadcast on television and the Internet by the political leaders and health experts in their states and municipalities. In these difficult times, we ask that the NAB act quickly so that all of its members in the broadcasting field follow standards to make their coverage fully accessible to all including the deaf and hard of hearing community.

This requires that every such press conference has **both** qualified American Sign Language (ASL) interpreters and accurate captioning. The deaf and hard of hearing community is diverse and while some require qualified interpretation into ASL to understand a press briefing about the complexities of protecting themselves from coronavirus, many others do not know ASL and depend on accurate captioning to understand the same information. Altogether, there are at least 48 million deaf and hard of hearing people in this country, and we ask you to do the right thing and make sure everyone understands what they need to do during this crisis.

Public press conferences on coronavirus should have a qualified ASL interpreter standing next to the political officer or health care expert speaking at the conferences. We ask that all broadcasters make sure that their broadcasts for both television and the Internet include the ASL interpreter(s) in the screen and that their signing is clearly visible and adequately lit to be seen by anyone watching. There have been too many instances of broadcasters having the camera only on the speaker to the point where the interpreter is not visible at all or only partially visible. This is a complete disservice and renders the information completely inaccessible to the many deaf and hard of hearing individuals across the country who rely on ASL to comprehend what they need to do to protect themselves during these times.

Moreover, there are numerous reports that captioning is not provided during such emergency briefings on television in many markets, in contravention of 47 C.F.R. § 79.2. Further, such video content is being uploaded to the Internet without captioning, in contravention of the 21<sup>st</sup> Century Communications and Video Accessibility Act, 47 U.S.C. § 613.

Please send a notice to your broadcasting members and ask them to include the ASL interpreter in the camera shot and to ensure that their content is appropriately captioned on both television and the Internet. We appreciate your assistance in this matter. Please contact me if you have questions or wish to discuss further.

Sincerely,

A handwritten signature in black ink, appearing to read 'Howard A. Rosenblum', written over a white background.

Howard A. Rosenblum  
NAD Chief Executive Officer