

March 2, 2004

To: The Consumer Advisory Committee of the Federal Communications Commission (FCC)  
From: Modernizing the FCC subgroup of Education, Outreach & Complaints Working Group

Re: Proposed Recommendations to the FCC on Modernizing the FCC

Fellow Committee Members:

Over the past several months, our group has worked with other Consumer Advisory Committee (CAC) members and staff of the Federal Communications Commission (FCC) to gain insight into its modernization activities and plans. After the initial meetings, the members of the Education, Complaints and Outreach working group were provided with a summary of each meeting and had an opportunity to review and modify the recommendations developed by our working group. The results of this joint effort are attached below.

We now propose the CAC, as whole, review the recommendations and carefully consider formally presenting their approved recommendations to the Commission in the March meeting. In addition, we would like to discuss with the CAC an appropriate timeline for an FCC response to the recommendations. Our working group will also be happy to work further on recommendations or discussion points that the committee suggests. We appreciate the efforts of committee members who have joined us in this work and the opportunity to discuss the important issues with the Commission. Anyone wishing to join the Modernizing the FCC subgroup in these and other efforts identified by the CAC are most welcome.

Sincerely,

David Poehlman, Co-Chair  
Susan Mazrui, Co-Chair  
Claude Stout, Co-Chair

## RECOMMENDATIONS

**Consistent with Department of Justice guidelines, establish and regularly update quality controls, policies, methods and procedures to ensure that as the FCC site changes it remains accessible to people with disabilities.**

- Focus special attention on the Electronic Comment Filing System, ECFS Express, the complaint form and areas that encourage public involvement.
- Follow the Access Board/WAI guidelines for Web access and, as part of the quality controls, review the site with community organizations or companies that specialize in Web accessibility for people with disabilities.
- Ensure adequate resources are allocated to make modifications needed in order to comply with Section 508 requirements.
- Improve the "search" functionality and usability of the Electronic Comment Filing System, ECFS Express, complaint form and E-DOCS systems.
- Develop voluntary guidelines for comment submissions that will improve accessibility to people with disabilities and reduce conversion cost for FCC staff as well as improve the ability of the public to more effectively "search" public comments and documents converted to electronic formats by the Commission.
- To reduce cost to the FCC, research and, as appropriate, adopt automated tools that convert PDF files into other formats.
- Add streaming video of various events - live and archived - to the Commission's Website and add captions to those clips as needed.

**Develop an action plan that will make the FCC Website more usable for people over 50 and for those for whom English is a second language.**

- Review the site for cultural sensitivity.

**Compile and disseminate a list of "best practices" that have been developed or noted by the Consumer and Government Affairs Bureau or others inside and outside the FCC for outreach to diverse communities using high-tech and low-tech means.**

**Provide training opportunities for FCC personnel to ensure that expertise is developed and maintained at the Commission regarding the telecommunication needs of diverse populations including but not limited to individuals with disabilities, seniors and those living in rural lands or tribal areas.**

**Make the public aware of the work the FCC has done and is doing to ensure that information, provided in electronic formats, reaches those who do not have access to computers, efforts to make telecommunications available to populations that have historically been underrepresented in use or availability of technology and to comply with Section 508 requirements.**

**Expand the "Parents Place" to include information about captioning for literacy and for children and parents with hearing disabilities.**

Adopted by cac: March 26, 2004