

Recommendation of the Disability Advisory Committee
Best Practices for Graphical Emergency Alerts
Adopted February 28, 2018
Filed in MB Docket No. 12-107

Pertaining to a matter raised by the Federal Communications Commission (Commission) requesting the Video Programming Subcommittee (subcommittee) of the Disability Advisory Committee (Committee) to review and provide recommendations on the following concern—

“Develop best practices for the aural {AUDIO} description (for people who are blind or visually impaired) of visual but non-textual emergency information provided by broadcasters, such as the critical details of an emergency conveyed by radar maps and other graphic displays.”—

The Committee sets forth the following:

- (1) WHEREAS 47 C.F.R. § 79.2(b)(2)(ii) calls for emergency alerts conveyed in a visual manner during programming outside of news and breaking news segments to be accessible to individuals who are blind and visually impaired;
- (2) AND WHEREAS such efforts to make emergency programming accessible have focused on conversion of text crawls to audible speech through the use of a text-to-speech (TTS) protocol carried over a secondary audio program (SAP) stream;
- (3) AND WHEREAS advancements in broadcasting have allowed for the insertion of images and moving graphics conveyed through a dynamic video image crawl to augment the traditional text crawl on the lower third of broadcast programming;
- (4) AND WHEREAS such images and dynamic video image crawls have the potential to provide audience viewers with detailed information provided through automated video feeds such as those provided by weather radar providers, and in doing so create a dilemma as current TTS protocols are reliant upon text scripts and therefore unable to identify images in a manner that could be conveyed in a textual way identifiable by existing TTS protocols;
- (5) AND WHEREAS the nature of emergency alerts covered under Section 79.2(b)(2)(ii) can occur at any time with no to little warning and thus pose multiple constraints toward finding a solution that relies on human description or other traditional means of adequately scripting text for TTS protocols;
- (6) AND WHEREAS the Commission, in seeking the advice of the Committee on the best practices for aurally describing emergency information provided visually during non-news programing, has resulted in the Committee -- after spending a significant amount of time over the past year examining the issue -- identifying no clear technical

solution capable of describing images or dynamic video images in a timely, accurate, and reliable manner capable of being deployed across existing broadcast systems;

- (7) AND WHEREAS the Committee, in further working to gain clarification and examples of critical details of emergency information under Section 79.2(b)(2)(ii) conveyed via an image or dynamic video image and not included in the accompanying text crawl has resulted in the Committee being unable to find instances where the critical details were only conveyed via image or dynamic video image -- although the finding of no such examples does not mean such instances are impossible;
- (8) AND WHEREAS the Committee has been informed that the use of images or dynamic video images passed through such emergency crawls during news and/or breaking news segments covered under 47 CFR § 79.2(b)(2)(i) serve more to reinforce already described or explained programming by the broadcaster;
- (9) AND WHEREAS until a solution exists to remedy the issue at hand toward describing stationary and dynamic images passed through emergency crawls, greater attention must be given to assure that broadcasters employ best practices to describe such images;
- (10) AND WHEREAS none of the subsequent recommendations should be construed to express an opinion about any rule or the application or waiver of any rule, including the other provisions of Section 79.2, other than Section 79.2(b)(2)(ii) and only pertaining to the accessibility of images and dynamic video of emergency information;
- (11) NOW IT IS
 - (1) RECOMMENDED that the Commission consider the findings above that there are no solutions available to ensure timely, accurate, and/or reliable descriptions of images and dynamic video displayed as part of an emergency information crawl over existing legacy broadcast systems over the foreseeable future;
 - (2) AND BE IT FURTHER RECOMMENDED, in order to not distract future progress toward identifying technology capable of being deployed over emerging systems that hold greater potential for developing workable solutions for accessible emergency information, the Commission subsequently move to extend the waiver of the Section 79.2(b)(2)(ii) requirement that images and dynamic video displayed as part of an emergency information crawl be described for five (5) years to covered entities covered under Section 79.2(b)(2)(i); and
 - (3) AND BE IT FURTHER RECOMMENDED that the Commission call upon industry and consumer groups to work together toward finding workable solutions for emerging broadcast systems, and in the interim consumer groups and industry leaders work together to assure that best practices are communicated to stations for potential use when stationary and dynamic images displaying emergency information are broadcast in a manner applicable to Section 79.2(b)(2)(i).