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**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554**

|                                               |   |                      |
|-----------------------------------------------|---|----------------------|
| In the Matter of                              | ) |                      |
|                                               | ) |                      |
| Implementation of Section 716 and 717 of the  | ) |                      |
| Communications Act of 1934, as Enacted by the | ) | CG Docket No. 10-213 |
| Twenty-First Century Communications and       | ) |                      |
| Video Accessibility Act of 2010               | ) |                      |
|                                               | ) |                      |

**COMMENTS OF THE ACCESSIBILITY ADVOCACY ORGANIZATIONS**

TDIforAccess, Inc.  
Deaf Equality  
Communication Service for the Deaf  
Rehabilitation Engineering Research Center on  
Technology for the Deaf and Hard of Hearing  
National Association of the Deaf  
Perkins School for the Blind  
Hearing Loss Association of America  
American Foundation for the Blind  
American Council of the Blind  
Deaf Seniors of America

Dated: August 10, 2026

## **EXECUTIVE SUMMARY**

The Accessibility Advocacy Organizations support certain tentative findings outlined in the Public Notice but encourage the Commission to strengthen the findings included in the final Report submitted to Congress. Rather than summarizing the numerous accessibility and usability concerns raised by commenters, or generically finding that gaps remain, the final Report should identify with specificity the remaining gaps already identified in the record so that policymakers can more readily target and develop specific actions that could close these gaps.

We also provide in our comments additional observations and recommendations to enhance the Commission's findings and ensure that the 2026 Biennial Report more completely and accurately reflects the persistent accessibility and usability barriers experienced by people with disabilities in today's communications ecosystem. Such barriers include (among other things) continued challenges with the accessibility and usability of interoperable video conferencing services ("IVCS") within and across IVCS platforms; access to emergency services resulting from the lack of nationwide deployment of Real-Time-Text to 911 and Direct Video Calling ("DVC") for emergency calls; inaccessible customer service, documentation, and inadequate training for customer support personnel; difficulties with navigating or overcoming inaccessible multi-factor authentication ("MFA") processes; inaccessible touchscreens; and unique risks and shortcomings associated with artificial intelligence-enabled and other emerging technologies.

The 2026 Biennial Report should reflect that continued improvements are needed to ensure full access to, and the usability of, advanced communication services under the Twenty-First Century Communications and Video Accessibility Act of 2010 ("CVAA") and telecommunications access under Section 255 of the Telecommunications Act. By expressly recognizing (as final findings) that barriers persist in key areas and that these continued barriers

impede accessibility and usability of essential and emerging communications technologies for consumers, the Commission will increase the value of the 2026 Biennial Report to policymakers as they evaluate potential legislative or regulatory efforts required to close gaps that remain.

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**COMMENTS OF THE ACCESSIBILITY ADVOCACY ORGANIZATIONS**

TDIforAccess, Inc. (“TDI”), Deaf Equality, Communication Service for the Deaf, Rehabilitation Engineering Research Center on Technology for the Deaf and Hard of Hearing, National Association of the Deaf, Perkins School for the Blind, Hearing Loss Association of America, American Foundation for the Blind, American Council of the Blind, and Deaf Seniors of America (collectively, “Accessibility Advocacy Organizations”) submit these comments in response to the Federal Communications Commission (“Commission” or “FCC”) Public Notice<sup>1</sup> seeking comments on the Commission’s tentative findings for the 2026 Biennial Report to Congress under the Twenty-First Century Communications and Video Accessibility Act of 2010 (“CVAA”).

The Accessibility Advocacy Organizations appreciate that the Commission’s Public Notice extensively references our prior comments and request that the final report more clearly identify the specific accessibility and usability barriers that continue to prevent full and equitable access to communications technologies. As a coalition of national non-profit organizations who advocate

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<sup>1</sup> *Consumer and Governmental Affairs Bureau Seeks Comment on Tentative Findings for the 2026 Twenty-First Century Communications and Video Accessibility Act Biennial Report*, Public Notice, DA 26-650 (rel. Jul. 1, 2026) (“2026 Public Notice”).

for the interests of the 48 million Americans who are deaf, hard of hearing, late-deafened, DeafBlind, and DeafDisabled, as well as the 50 million more who are blind or have low vision, the Accessibility Advocacy Organizations appreciate the opportunity to again participate in the development of this important Report.

More than 15 years after adoption of the CVAA, people with disabilities continue to lack full access to many communication and video tools that are essential today. In these comments, we support certain tentative findings outlined in the Public Notice and request that the Commission strengthen its tentative findings and add additional findings to address issues identified by our organizations. Although the Public Notice summarizes the numerous accessibility concerns raised by commenters, many of these issues are presented as stakeholder observations rather than tentative findings. The Accessibility Advocacy Organizations therefore encourage the Commission to strengthen the findings included in the final Report submitted to Congress by expressly recognizing these ongoing barriers as areas that may require continued regulatory observation and attention. Doing so will increase the value of the 2026 Biennial Report to policymakers as they evaluate the current accessibility and usability landscape and potential legislative or regulatory efforts required to close gaps that remain.

We also identify below areas where the 2026 Biennial Report should more completely and accurately reflect the persistent accessibility and usability barriers experienced by people with disabilities in today's communications ecosystem.

## **I. Strengthening the Commission's Findings in the 2026 Biennial Report**

### **A. Continued Improvement of Accessibility of Telecommunications and Advanced Communications Services and Equipment**

The Commission "tentatively find[s] that accessibility of telecommunications and advanced communications services and equipment continues to improve; however, some



accessibility gaps persist due in part to technological and market barriers.”<sup>2</sup> The Accessibility Advocacy Organizations generally agree with this tentative finding, and that the “accessibility gaps” that remain are persistent and significant accessibility barriers that continue to affect everyday communications for individuals with disabilities. However, rather than generally alluding to the gaps that remain and referencing stakeholder observations about continuing challenges, the 2026 Biennial Report should expressly recognize (as final findings) that barriers persist in key areas and that these continued barriers impede accessibility for consumers. In particular, the Commission’s final Report should include findings of ongoing challenges with respect to the accessibility of interoperable video conferencing services (“IVCS”), customer service, emergency communications, caption quality, authentication, hearing aid compatibility, AI-enabled communications, and accessibility across emerging communications technologies.

In other words, rather than generically finding that gaps remain, the Commission’s final Report should identify with specificity the remaining gaps that commenters have already identified in the record so that policymakers can more readily target and develop specific actions that could close these gaps.

#### **B. Inclusion of People with Disabilities in Product and Service Design and Development**

The Commission “tentatively find[s] that covered entities have continued to include people with disabilities in product and service design and development.”<sup>3</sup> Although the Accessibility Advocacy Organizations agree with the premise of this tentative finding, the Commission should go further. The Commission’s final finding in the 2026 Biennial Report should acknowledge the need for accessibility to be incorporated throughout the entire product lifecycle—from concept

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<sup>2</sup> 2026 Public Notice, ¶ 10.

<sup>3</sup> 2026 Public Notice, ¶ 27.

development, design and usability testing, to deployment, updates and ongoing maintenance—with meaningful and continuous participation by individuals representing the full disability community. The inclusion of people with disabilities in these processes to an even greater extent is necessary and would further advance the delivery of equitable communications, particularly as technologies continue to develop and evolve.

### **C. Effect of Section 717 on Development and Deployment of New Communications Technologies**

The Commission “tentatively find[s] that there has been no effect on the development and deployment of new communications technologies” as a result of the requirements of Section 717.<sup>4</sup> Although the Accessibility Advocacy Organizations generally agree that Section 717 has not hindered innovation, the final findings in the 2026 Biennial Report should go further by expressly acknowledging that the recordkeeping requirements and Request for Dispute Assistance process under Section 717 continue to promote accountability and to identify accessibility barriers requiring industry attention in response to the consumer experience.

### **D. Improvements in Usability**

The Commission “tentatively find[s] that, while usability continues to improve for some covered services and equipment, there is still room for improvement.”<sup>5</sup> The Accessibility Advocacy Organizations support this finding but observe that the Commission made a highly similar finding in its *2024 Biennial Report to Congress*.<sup>6</sup> The similarity of the Commission’s tentative finding now with its final finding on usability from two years ago suggests that the Commission’s final Report would benefit from a more thorough catalogue of the usability barriers

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<sup>4</sup> 2026 Public Notice, ¶ 42.

<sup>5</sup> 2026 Public Notice, ¶ 22.

<sup>6</sup> *Biennial Report to Congress as Required by the Twenty-First Century Communications and Video Accessibility Act of 2010*, CG Docket No. 10-213, 39 FCC Rcd 11289 (2024).

that remain. Rather than generally observing that there is room for improvement, the Commission's findings on usability could be improved by highlighting specific barriers that require improvement to achieve the usability goals in the CVAA.

For example, the Accessibility Advocacy Organizations note that technical compliance with the Commission's accessibility requirements alone does not always result in meaningful accessibility where there are gaps in implementation or awareness that impede usability for consumers. As an illustration in the healthcare context, an interoperable video conferencing platform might provide captioning functionality that complies with the text and spirit of the Commission's accessibility requirements, yet we receive reports that awareness of those features among healthcare providers and consumers remains limited. As a consequence, captioning access continues to be denied, even though the law requires it. Where accessibility features exist but remain unknown or difficult to locate, implementation barriers continue to limit the practical effectiveness of the Commission's accessibility requirements and the meaningful accessibility they are intended to achieve.

The Accessibility Advocacy Organizations also recommend that the final Report highlight other particular usability barriers that persist and impede overall accessibility for consumers. For example, a provider making information about accessible features or user guides available to consumers does not remedy concerns about usability if the manuals or user guides provided are not available in accessible formats or customer service staff are not adequately trained to respond to consumer inquiries about how these accessibility features work.<sup>7</sup> Nor should the Commission assume that emerging communications technologies are fully usable by individuals with disabilities if such usability depends upon inaccessible authentication technologies or

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<sup>7</sup> See 2026 Public Notice, ¶ 23.

functionalities that result in inaccurate captions.<sup>8</sup> By more directly identifying remaining barriers, policymakers will be able to more easily identify the specific areas that warrant further attention and take action (to the extent necessary) to close remaining usability gaps.

#### **E. Accessibility Barriers to New Technologies**

The Commission “tentatively find[s] that accessibility barriers persist with respect to new communications technologies, even as ‘innovation is expanding both the functionality and usability of accessible communications tools for people with disabilities.’”<sup>9</sup> The Accessibility Advocacy Organizations acknowledge that progress has been made, including through the introduction of new or enhanced accessibility-focused features that can aid in resolving accessibility barriers. However, the Commission could strengthen this tentative finding by identifying in further detail the specific emerging technologies where accessibility barriers continue to persist, and where new or enhanced technologies and features present new challenges or barriers that need addressing.

The Accessibility Advocacy Organizations agree that technologies like voice assistants and other AI-enabled tools are promising developments for consumers seeking enhanced accessibility options, but caution that even these technologies and tools present unique challenges that must be addressed to ensure accessibility for all consumers. Such challenges include inconsistencies in the accuracy of voice recognition technology and the inconsistent incorporation of accessibility features across platforms, each of which create barriers that impede the usability of these new tools for individuals with disabilities. For example, research by the American Foundation for the Blind (“AFB”) found that just 4% of survey participants found AI captions to be “extremely accurate”

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<sup>8</sup> See 2026 Public Notice, ¶¶ 23-24.

<sup>9</sup> 2026 Public Notice, ¶ 29 (citation omitted).

while 42% found them to be only “somewhat accurate”.<sup>10</sup> More strikingly, AFB found that 24% of deaf and hard of hearing survey participants reported mistakes in AI captions that negatively impacted them, while 15% of hearing disabled users reported mistakes that had a negative impact on the user.<sup>11</sup> What this reveals is that although new technologies can improve the user experience in certain contexts, policymakers need to remain cognizant of the new or different accessibility and usability challenges accompanying emerging technologies.

In addition to more thoroughly cataloging the persistent and newly emerging barriers that arise from emerging technologies, the Commission should also strengthen this tentative finding by recognizing the need for continued Commission oversight and, where necessary, regulatory action to ensure that accessibility gaps are identified and addressed promptly. Doing so will help ensure that consumers with disabilities can fully access evolving communications technologies as these develop and become more integrated into everyday life.

## **II. Additional Observations and Recommendations for Findings in the 2026 Biennial Report**

In addition to strengthening certain of the tentative findings as described above, the Accessibility Advocacy Organizations provide the following observations and recommendations to enhance support for the Commission’s findings.

### **A. Improving Accessibility of Interoperable Video Conferencing Services**

The Accessibility Advocacy Organizations recommend strengthening the discussion of IVCS accessibility by recognizing that video conferencing platforms have become essential for employment, education, healthcare, civic participation, and daily life and that, despite

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<sup>10</sup> See Silverman, A. M., Whistler, A. L., Shock, A., Heydarian, C. H., Baguhn, S. J., Hanuschock, W. E., Hashimoto, A., Khan, O., & Vader, M-L., *The AI Quagmire: Benefits, Risks, and User Aspirations Through a Disability Lens*, at p. 27 (2026) (“AI Quagmire”).

<sup>11</sup> *Id.*

improvements, accessibility remains inconsistent across platforms. Although the Public Notice highlights a number of ongoing challenges with respect to IVCS accessibility, as identified in prior comments by the Accessibility Advocacy Organizations and other commenters,<sup>12</sup> the essential nature of IVCS in modern life warrants heightened attention and scrutiny. While the Commission has regulations already to address the accessibility of specific video conferencing features for certain segments of the disability community,<sup>13</sup> the final Report should find that broader gaps need to be resolved before IVCS can be considered truly accessible as an everyday communications platform for all individuals with disabilities.

In particular, blind and low vision users continue to encounter significant barriers when using IVCS for daily communications. Such users continue to face inconsistent functionality of IVCS platforms with screen readers and other assistive technologies, lack of full compatibility to enable the seamless sharing of content (such as documents and presentations) within IVCS calls, difficulties with monitoring in-call chat features while participating in meetings, inconsistent navigation across platforms, and varying levels of accessibility between popular services such as Zoom, Microsoft Teams, and Google Meet. These significant barriers create substantial obstacles for individuals with disabilities who need to rely on IVCS platforms to communicate, work, access services, and engage in other essential daily activities.

The Commission's final Report also should recognize that the ability to independently access documents and other content that are shared during virtual meetings is an important

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<sup>12</sup> 2026 Public Notice, ¶¶ 15-17.

<sup>13</sup> *Access to Video Conferencing; Implementation of Sections 716 and 717 of the Communications Act of 1934, as Enacted by the Twenty-First Century Communications and Video Accessibility Act of 2010, Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities*, Second Report and Order and Further Notice of Proposed Rulemaking, FCC 24-95, 39 FCC Rcd 11068 (2024).

component of IVCS accessibility. Without this access, certain users (including users who are blind) may be unable to participate fully in collaborative editing and other shared work activities that (in today’s society) often occur via IVCS platforms.

Finally, the Commission should use its 2026 Biennial Report as an opportunity to encourage the integration of third-party visual interpretation services, such as Aira, as a means to provide descriptions and orientation to visual content shared via IVCS. Incorporation of these types of visual interpretation services could be achieved in a manner similar to the manner in which sign language interpreters are utilized on many IVCS platforms today. Including this as a recommendation in the 2026 Biennial Report would increase awareness among industry, policymakers, and consumers of the availability and about the utility of third-party visual interpretation services as a means of advancing accessibility and usability for individuals who are blind and low vision.

## **B. Improving Accessibility of Emergency Communications**

The Public Notice rightly recognizes several specific improvements that are needed to ensure accessible access to emergency services over today’s communications technologies. However, the Public Notice lacks any specific tentative findings regarding the current state of emergency communications or recommendations to spur improvements.<sup>14</sup> Nor does the Public Notice make any affirmative recommendations or findings regarding the “One Number Solution” (*i.e.*, enabling users of video relay service (“VRS”)/telecommunications relay service (“TRS”) to use a single standard 10-digit phone number) or other technologies important for emergency communications.<sup>15</sup>

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<sup>14</sup> See 2026 Public Notice, ¶ 19.

<sup>15</sup> See 2026 Public Notice, ¶ 20.

The Commission's final Report should also highlight examples of advancements in accessible telecommunications services that are being successfully implemented. For example, the nationwide deployment of Direct Video Calling (“DVC”) for the National Suicide & Crisis Lifeline,<sup>16</sup> available since its launch on September 29, 2023, demonstrates the feasibility and effectiveness of DVC in improving the accessibility of emergency communications.

As the Commission has observed, approximately 30,000 callers to 988 utilized DVC during its first ten months of operation, “demonstrating the practicability and benefits of offering DVC as a means of accessing emergency services.”<sup>17</sup> DVC access to 988 is enabled through the TRS Numbering Directory using the same open SIP standards that support VRS. This established infrastructure can likewise support DVC access to 911 and other customer service applications without requiring the development of new underlying technologies.

By including concrete findings that highlight where accessible technologies are already deployed successfully and at scale, the final Report can better illustrate the progress being made under the CVAA while identifying proven, standards-based solutions that can be extended to other priority areas. Such examples demonstrate not only that accessibility goals are achievable, but that scalable implementations already exist and can inform future Commission policy.

The CVAA obligates the Commission to ensure that people with disabilities have equal access to emergency services in a national IP-enabled emergency network. While the Commission

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<sup>16</sup> Substance Abuse and Mental Health Services Administration, “988 Suicide & Crisis Lifeline Adds American Sign Language Services for Deaf and Hard of Hearing Callers,” Press Announcement (Sept. 8, 2023), available at: <https://www.samhsa.gov/newsroom/press-announcements/20230908/988-suicide-crisis-lifeline-adds-american-sign-language-services-deaf-hard-of-hearing-callers>.

<sup>17</sup> See *In the Matter of Facilitating Implementation of Next Generation 911 Services (NG911), Improving 911 Reliability*, PS Docket Nos. 21-479 and 13-75, Second Report and Order and Second Further Notice of Proposed Rulemaking, n. 536 (rel. Jun. 26, 2026) (citing *Direct Video Calling Can Enhance Accessibility of Consumer Call Centers*, CG Dockets Nos. 03-123 and 10-51, Public Notice, 39 FCC Rcd 13628, 13630 (CBG 2024)).



has adopted numerous regulations to facilitate equal access, the Commission's 2026 Biennial Report should acknowledge that additional steps are needed to ensure accessibility of the nation's emergency communications system. The Commission therefore can strengthen the Report's discussion of emergency communications by expressly acknowledging the need for:

- Increased availability and implementation of reliable Real-Time-Text ("RTT") to 911 across public safety answering points ("PSAPs").
- Implementation of DVC to 911 within NG911, as the best means of achieving effective and direct communications for emergency calls and eliminating the need for interpretation services for these calls.
- Improving the accessibility of emergency alerts and other public safety communications, including through continued implementation of multi-lingual emergency alerts that incorporate American Sign Language ("ASL").
- Continued development of the One Number Solution to reduce fragmentation, streamline communications, and advance more equitable and effective access to emergency services for individuals with disabilities that rely on different telephone numbers to receive voice calls, texts, and relay calls.

### **C. Improving Accessibility of Customer Support and Documentation**

The Accessibility Advocacy Organizations agree that inaccessible customer service remains a persistent accessibility barrier, in particular for systems that rely on inaccessible interfaces.<sup>18</sup> We therefore recommend that the Commission more fully address upon the specific accessibility barriers to customer service in the final 2026 Biennial Report.

Notwithstanding the emergence of new and innovative technologies and tools that can reduce accessibility barriers, the Commission should acknowledge that AI-powered customer service chat systems frequently fail to interact properly with screen readers or other accessibility

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<sup>18</sup> See 2026 Public Notice, ¶ 21 (acknowledging consumer organization commenters who identified remaining accessibility barriers in some customer service systems that rely on automated chat interfaces or phone systems, which may not be fully accessible).

tools, which prevents blind and low vision users from independently obtaining customer support assistance that otherwise may be available to other members of the general public. These barriers are compounded when companies provide limited or no accessible alternative communication methods beyond web- or app-based chat interfaces, which is becoming a more frequent practice as technologies continue to advance and companies seek operational efficiencies. While the Accessibility Advocacy Organizations appreciate the benefits of companies leveraging new technologies to serve their customer base, it is critical that such progress not result in a degraded customer experience for individuals with disabilities.

The Commission should take the opportunity to use its 2026 Biennial Report to encourage covered entities to provide accessible customer support across multiple modalities. This includes making DVC available as an accessible option for Deaf and hard of hearing consumers who communicate in ASL so that they can communicate in their own language with customer support personnel. As the Accessibility Advocacy Organizations have consistently emphasized, ensuring the availability of options to facilitate direct communications with customer service in ASL can reduce reliance on third-party relay services and mitigate risks of misinterpretation stemming from cultural and linguistic barriers that can result when communicating through a third party.

Finally, as noted above, the Commission should encourage covered entities to increase training of their staff regarding accessibility features of their products, instruction manuals, user guides, and troubleshooting materials, and through more effective communication with individuals with disabilities who require customer support care.

#### **D. Improving Accessibility of Multifactor Authentication**

The Public Notice acknowledges that many requests for dispute assistance (“RDAs”) filed with the Commission have complained of inaccessible multi-factor authentication (“MFA”)

processes.<sup>19</sup> However, the Notice contains very little discussion about the challenges that individuals with disabilities experience navigating or overcoming inaccessible MFA. The Commission’s final Report should include more robust discussion of these accessibility challenges as MFA prompts become increasingly prevalent in today’s online world—whether for accessing financial or other accounts online, emails and other communications tools, or for engaging with government agencies through websites.

For example, individuals with cognitive disabilities frequently experience challenges understanding unique and unfamiliar authentication workflows or managing time-limited codes before they expire. Individuals with mobility or dexterity disabilities can face challenges with precise positioning for authentication when this form of authentication relies on positive facial recognition or timely completion of the MFA process, which can require users to navigate multiple devices and applications at the same time to successfully complete authentication. Likewise, visual CAPTCHAs can be inaccessible to persons who are blind or low vision if they require sight to identify the visual image or identify differences in low-contrast images. Similarly, audio CAPTCHAs can be difficult for users to understand and complete.

These examples illustrate how inaccessible authentication systems not only create significant consumer frustration for people with disabilities; they effectively deny access to essential services and systems that are critical for daily life.

#### **E. Improving Touchscreen Accessibility**

Although the Public Notice briefly acknowledges that RDAs have identified inaccessible touchscreens as a barrier for blind users or users with limited mobility or dexterity,<sup>20</sup> it fails to

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<sup>19</sup> See 2026 Public Notice, ¶ 36.

<sup>20</sup> See *id.*

elaborate on the reasons why these barriers exist. The Accessibility Advocacy Organizations recommend that the 2026 Biennial Report acknowledge that touchscreen accessibility depends, at least in part, on appropriate software implementation. Where a device lacks accessible software, including a built-in screen reader and accessibility features, the device will remain unusable for many blind and low vision users. Moreover, the Commission’s final Report should recognize the importance of ensuring that touchscreens are compatible with refreshable Braille displays to ensure accessibility for individuals who are DeafBlind.

#### **F. Improving Accessibility of Artificial Intelligence and Emerging Technologies**

As discussed above, the Accessibility Advocacy Organizations acknowledge that AI-enabled tools and other emerging technologies hold promise for improving access by people with disabilities to products and services. The Commission should continue to highlight and support the development and proliferation of such innovations – for example, AI-powered captioning and automated transcription, speaker identification, navigational assistance, and visual interpretation services. At the same time, the Report should acknowledge the risks and possible shortcomings that some advanced technologies can create for people with disabilities if they are not developed, tested, and evaluated with input from individuals with disabilities to ensure accuracy, reliability, transparency, and meaningful accessibility. Such risks include (but are not limited to) specific concerns about the ability for individuals with disabilities to understand and control how AI and other emerging technologies are using their data, particularly sensitive personal or employer data.<sup>21</sup>

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<sup>21</sup> See Shock, A. & Silverman, A. M., *Working with the Machine: AI’s Expanding Role in Employment for People with Disabilities*, American Foundation for the Blind (2026), available at: <https://www.afb.org/research-and-initiatives/ai-series/working-machine>.

### **III. Conclusion**

The Accessibility Advocacy Organizations appreciate the opportunity to submit these comments on the Commission’s upcoming 2026 Biennial Report.

As articulated above, notwithstanding progress in some areas, persistent accessibility and usability gaps continue to limit equitable access to essential and emerging communications technologies. As such, the 2026 Biennial Report should reflect that continued improvements are needed to ensure full access to, and the usability of, advanced communication services under the CVAA and telecommunications access under Section 255 of the Telecommunications Act. The Commission’s continued leadership—in this case, by providing a Biennial Report that delivers a robust analysis of both technological progress and accessibility shortfalls—will be critical to ensuring improved accessibility, usability, and equitable access for all.

We look forward to continuing to work with the Commission on the actions needed to fill these accessibility gaps.

Respectfully submitted,

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