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September --, 2024

Dr. Sachin Dev Pavithran, Executive Director

United States Access Board

1331 F Street NW, Suite 1000  
Washington, DC 20004-1111

Dear Dr. Pavithran:

The American Council of the Blind appreciates the opportunity to submit comments for the Access Board’s hearing on artificial intelligence and its impact on people with disabilities. AI has the potential to enhance the quality of life for blind and low vision individuals; however, AI can only be beneficial if it is designed to be accessible and inclusive at the outset.

One way that AI has been utilized is the development of autonomous vehicles. Blind and low vision individuals cannot drive, so being able to use AVs to get around their community would be life-changing. This can only happen if AVs are designed to be accessible with an audible way to locate the vehicle on arrival, accessible ingress and egress, and accessible methods of getting riders to their destinations. AVs must also be able to recognize and stop for pedestrians with disabilities, including blind and low vision pedestrians. These can only be achieved if manufacturers design with accessibility in mind and include the disability community in the early development stages.

Another area where AI is increasingly being used is in employment. AI tools that are being used to interview, screen, and monitor employees must be designed in ways that accommodate individuals with disabilities. Such tools should not automatically screen out or terminate an interview candidate that cannot make eye contact due to a visual disability, or employees with performance patterns due to the use of assistive technology. If employment technology manufacturers do not develop AI tools with accessibility or disability in mind, then such outcomes where individuals with disabilities are screened out or terminated will occur.

AI also offers opportunities for new assistive technology for persons who are blind. AI can read documents out loud and interpret the environment around the person. More should be done to enhance such technology.

Sincerely,

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Claire Stanley

Director of Advocacy and Governmental Affairs