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September 25, 2025

U.S. Federal Communications Commission

Chairman Brendan Carr

45 L Street, SE

Washington, D.C. 20554

Docket No.: 25-224

Dear Chairman Carr:

Thank you for the opportunity to comment on this notice of proposed rule-making (NPRM) regarding emergency alert systems (EAS) and wireless emergency alerts (WEA) as governed by the Federal Communication Commission (FCC). As technology evolves and we must respond to more emergency situations, we appreciate the ability to offer input on how the FCC can better respond and accommodate persons with disabilities in doing so.

The American Council of the Blind is the nation’s leading member-driven non-profit organization of and for people who are blind or have low vision. Founded in 1961 and comprised of more than 65 state and special-interest affiliate organizations, ACB strives to increase the independence, security, equality of opportunity, and to improve the quality of life for all people who are blind or experiencing vision loss.

Bridge Multimedia is a New York–based accessibility company advancing universal design across media and emergency communications. For over two decades, Bridge has delivered captioning, audio description, ASL, and accessible technology solutions. Its leadership includes service on the FCC’s Disability Advisory Committee, bringing regulatory and user-centered insight to these recommendations.

The following comments will be organized into three sections: I. Public-Facing Recommendations; II. Technical Recommendations; and III. Recommendation: Ad Hoc Accessible Emergency Notifications Advisory Group.

I. Public-Facing Recommendations

1. Role of User Testing and Advisory Oversight

1.1 Modernization must be guided by ongoing user testing with disability communities and reviewed by a time-limited FCC-convened Ad Hoc Accessible Emergency Notifications Advisory Group.   
1.2 This group should include subject matter experts (SMEs) for ASL/video templates, screen-reader/Braille UX, cognitive load research, and geospatial map-to-speech.

2. Core User-Centered Requirements

2.1 Alerts must communicate five elements: nature of the emergency, affected area, required action, duration, and source.   
2.2 Plain language should be used, avoiding jargon or unexplained acronyms.

2.3 Multimedia alerts must include audio descriptions, alt text, and ASL resources where appropriate.   
2.4 Accessible modalities must be delivered as close to simultaneous as technically feasible (time-to-parity).  
2.5 Baseline Languages: Maintain a minimum of 13 nationally supported languages in additional to ASL, with local augmentation based on Advisory-led user testing and regional demographics.

3. Personalization Guardrails

3.1 Support personalization (voices, languages, rates, formats) while preserving mandatory delivery of life-safety alerts.   
3.2 Allow users to opt into ASL templates and other accessible formats.

4. Public Education, Training & QA

4.1 Provide periodic training for originators, publish quality scorecards, and maintain credentialed interpreter/captioner rosters to ensure readiness for emergency events.

4.2 Conduct public education campaigns across multiple accessible formats.

5. Metrics & Reporting

Track and publish quarterly:

* Delivery latency (P50/P95)
* Time-to-parity for ASL/captions vs. text
* Overshoot/undershoot rates
* Accessibility conformance checks
* TTS intelligibility scores
* ASL availability and credentialed-provider utilization rates
* Avatar pilot usage and certification status

6. Non-Government Originators

Permit limited classes of non-government originators under MOU + accreditation + periodic audits, with mandatory accessibility conformance and revocation for non-compliance.

7. Accessible Radar Map Information

7.1 Radar maps and other graphical emergency information often carry life-critical, time-sensitive details about who is at risk and what protective actions are needed. Text crawls serve valuable purposes and should continue — but they often do not appear during break-ins to regular programming and, even when present, are inherently limited in conveying the full spatial and timing context of a storm.

7.2 We recommend that the Commission explicitly acknowledge that text crawls with TTS are an important interim step but not a complete solution. They should be viewed as a bridge to more comprehensive, intelligible solutions that can summarize key geographic and timing details in real time. This next step must be guided by user testing and developed with industry collaboration to ensure scalability and effectiveness.

II. Technical Recommendations

1. Accessible Authoring Tools & Templates

1.1 All CAP authoring tools must meet WCAG 2.1 AA or higher.   
1.2 Require standardized templates prompting for core elements, discourage jargon, and include accessibility prompts for alt text and plain language.   
1.3 Require procurement of accessible authoring tools only.

2. Author Feedback & Accessibility Checks

2.1 Provide in-tool accessibility checks, missing-information flags, and TTS preview.   
2.2 Validate interpreter/captioner credentials where applicable.

3. Metadata Preservation & Accessibility Indicators

3.1 Require preservation of accessibility metadata (language, ASL flags, alt-audio) across rebroadcasts.   
3.2 Add flags for ASL-available, caption-available, alt-audio-available, and avatar-rendered content.   
3.3 FCC should standardize metadata fields to reduce inconsistency.   
3.4 Maintain user settings for voice, rate, and haptic feedback where supported.   
3.5 Metadata must be preserved across rebroadcast paths throughout the lifecycle of an alert.

4. Multimedia Payloads & Fallbacks

4.1 Require descriptive text/audio for attachments, ASL template support, and well-defined fallbacks.   
4.2 Devices must present ASL video first when users have opted in.   
4.3 Publish best practices for ASL window inclusion (size, placement, contrast).   
4.4 Define fallback behavior so devices that cannot render rich media present text+TTS or equivalent modality.

5. Real-Time Updates, Duration & Timing

5.1 Ensure updates/cancellations propagate simultaneously across all devices.   
5.2 Measure and report accessible modality lag as part of pilots.   
5.3 Establish enforceable minimum display/audio durations through usability testing.   
5.4 Study impact of alert length on cognitive load and screen reader rendering.

6. Modality Redundancy & Delivery Channels

6.1 Deliver alerts via WEA, EAS, NOAA Radio, streaming, and emerging platforms to avoid exclusion.   
6.2 Avoid over-narrow targeting that excludes at-risk populations.

7. Authentication & Origin Tagging

Present originator information uniformly across platforms to support trust.

8. Resilience & Offline Delivery

8.1 Design alerting workflows to operate during power or broadband outages.   
8.2 Support offline-capable endpoints, battery-backed radios, broadcast fallback, and preserve accessibility metadata across all modes.   
8.3 Include examples such as battery-backed radios, broadcast fallback paths, and peer-to-peer/mesh delivery where feasible.

9. Public Education, Documentation & Feedback Channels

9.1 Publish accessible guides (Braille, ASL, plain language, audio).   
9.2 Provide accessible feedback mechanisms and route results back to originators.

9.3 Agencies must document and publish resourcing plans for interpreters/captioners. Include feedback channels such as web forms, SMS, phone with relay, and ensure routing back to originators.

10. Testing & Simulation

10.1 Quarterly pilots must include users of screen readers, Braille, and ASL overlays, verify credentialed provider use, validate ASL-first ordering, and measure time-to-parity.   
10.2 Coordinate semi-annual national tests with FEMA/IPAWS including accessibility validation, and release anonymized results for transparency.

11. Implementation Path for Radar Map Accessibility

Radar maps and other graphical emergency information often carry life-critical, time-sensitive details about who is at risk and what protective actions are needed. Text crawls serve valuable purposes and should continue — but they often do not appear during break-ins to regular programming and, even when present, are inherently limited in conveying the full spatial and timing context of a storm.

11.1 Interim Compliance: Treat equivalent text crawls with TTS as an interim measure that provides partial access but does not fully satisfy the obligation to provide equivalent information.

11.2 Gap Measurement: Require broadcasters to measure and report how often no text crawl is present during program interruptions and to document steps taken to ensure equivalent information is available in audio.

11.3 Innovation & Pilots: Encourage pilot projects that develop automated map-to-speech solutions capable of producing concise, intelligible summaries of risk areas and timeframes, with results reported to the Commission.

11.4 User Testing & Transition Roadmap: Formalize advisory-led testing for intelligibility, cognitive load, and actionability, and establish a roadmap for gradually reducing reliance on text crawls as the sole accessibility mechanism as better solutions become available.

12. Signing Avatars – Guardrails, Pilots, and Avatar Certification

Signing avatars must not replace human interpreters for life-safety alerts unless independently validated. Allow use in pilots and preparedness materials with disclosure.   
12.1 Establish certification via Gallaudet, RIT/NTID, or state credentialing bodies.

12.2 Require accuracy, prosody, comprehension, and device fidelity testing.   
12.3 Human-in-the-loop review remains mandatory until certification thresholds are met, with metadata flagging and fallback rules.

III. Ad Hoc Accessible Emergency Notifications Advisory Group

1.1 Establish a time-limited Advisory Group with expanded membership including Deaf-led organizations, Blind/Low Vision and Cognitive Access SMEs, technical experts, and state/local emergency managers.

1.2 Mandate includes review of pilot data, parity metrics, and avatar performance with authority to recommend updates to FCC guidance and template profiles.

Thank you again for the opportunity to comment on this notice. As an organization composed of people who are blind and who advocate for people with disabilities, we urge the FCC to consider all factors that can make sharing information about emergencies accessible to persons with disabilities. If you have any questions, please reach out to Claire Stanley at [cstanley@acb.org](mailto:cstanley@acb.org), or (202) 559-2041.

Sincerely,

A signature on a white background

AI-generated content may be incorrect.

Claire Stanley, J.D.

Director of Advocacy and Governmental Affairs

American Council of the Blind



Matthew Kaplowitz

CEO and Chief Creative Officer

Bridge Multimedia