



PO Box 2168, Manchester Center, VT 05255
802.362.7070 • www.gnat-tv.org

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Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: *In the Matter of Accessibility of User Interfaces, and Video Programming Guides and Menus, MB Docket No. 12-108, Notice of Proposed Rulemaking (FCC 13-77)*

Dear Commissioners:

Greater Northshire Access Television, Inc. submits this letter in the above-referenced rulemaking proceeding (NPRM) in support of the comments filed by the Alliance for Community Media; the Alliance for Communications Democracy; Montgomery County, Maryland; and the National Association of Counties, National Association of Telecommunications Officers and Advisors & U.S. Conference of Mayors.

Greater Northshire Access Television, Inc. is a not-for profit community media and training center operating four cable channels providing public, educational and government content. Our local programming is available to approximately 7000 subscribers in nine separate towns within three counties in rural Southern Vermont.

We have program descriptions readily available for our programs. However, currently, Comcast Cable program guide listings only indicate "local programming". We have received many verbal comments from our community viewership that the electronic program guide listings are inadequate and difficult to locate broadcast schedules, titles and accessibility information. This level of information is inadequate to meet the accessibility goals of the Twenty-First Century Communications and Video Accessibility Act of 2010 (CVAA). Viewers cannot determine from the MVPD's video programming guide what our programs are and whether our programs are accessible. Thus, viewers with visual or auditory disabilities cannot make meaningful video program choices.

We urge the Commission to adopt rules that would require video programming guides and menus which display channel and program information include, for all channels, high level channel and program descriptions and titles, as well as a symbol identifying the programs with accessibility options (captioning and video description).

Thank you for the opportunity to submit these comments.

Tammie Reilly

Executive Director, Greater Northshire Access Television