



American Council of the Blind

Together for a bright future

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May 30, 2023

Alan Davidson, Administrator
National Telecommunications and Information Administration
U.S. Department of Commerce
1401 Constitution Avenue, NW
Washington, DC 20230

Re: Development of a National Spectrum Strategy (Docket No. 230308–0068)

Dear Mr. Davidson:

The American Council of the Blind (ACB) thanks you and the National Telecommunications and Information Administration (NTIA) for the opportunity to share our thoughts on how a balanced national spectrum strategy will benefit people with disabilities and further the Biden-Harris Administration's goals to increase diversity, equity, inclusion, and accessibility through federal government policies.

ACB is a national member-driven organization that strives to increase the independence, security, equality of opportunity, and quality of life for people who are blind or have low vision. Our members believe that it is a fundamental responsibility of government to provide a framework of laws, policies, and infrastructure that permits people with disabilities to participate equally in all aspects of society. Throughout the Twentieth Century, this was primarily accomplished through advocacy and policies to increase access to the physical environment, for example: audible announcements and tactile warning strips for public transportation; the rights of disabled children to receive a free and appropriate public education, and the ability to receive printed government materials in alternative formats, such as braille or large print. Now, in the Twenty-First Century, access to the virtual environment is at least as significant as the need for access to our physical environment, and a balanced approach to spectrum policy and ensuring people with disabilities have the necessary tools and connectivity to access information and resources through smart and connected devices is essential to fostering greater independence, equality, and opportunity for our members and the broader disability community as a whole.

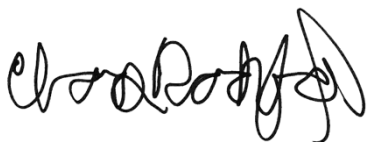
Many current and future services relied on by the disability community are and will be greatly enhanced by dedicated licensed spectrum. For example, remote visual interpretive services,

such as Aira and Be My eyes, provide people who are blind with important information about their surroundings. These services may be used at home over Wi-Fi networks, where an individual may receive sighted assistance remotely through the camera of a smart and connected device. These services are even more critical when used by a person who is blind or low vision to navigate their surroundings. When used by someone who is blind or low vision to safely and independently navigate their communities, public transportation systems, and places of public accommodation, such as shopping centers and grocery stores, remote visual interpretive services are greatly enhanced by dedicated wireless connections over licensed spectrum. This gives users the certainty of knowing a vital tool, their technological lifeline, will work when and where they need it. While these services are forms of assistive technology specifically designed to aide people with disabilities, there are other emerging technologies that will benefit from licensed spectrum and benefit not only people with disabilities but society as a whole.

In a new report from the National Disability Institute (NDI), entitled "[Economic Impacts of Removing transportation Barriers to Employment for People with Disabilities through Autonomous Vehicle Adoption](#)," NDI found that transportation is a major barrier to inclusion for people with disabilities. The widespread deployment and adoption of autonomous vehicle technology will improve access for people with disabilities and increase economic activity. According to NDI, autonomous vehicle technology could create 9.2 million jobs in the United States, and 4.4 million jobs for people with disabilities, while contributing \$876 million to the Grose Domestic Product. Licensed spectrum is essential to ensure that autonomous vehicles may operate safely and communicate with surface transportation infrastructure. Autonomous vehicles and other technologies not yet imagined, hold the promise to drive inclusion and accessibility for people with disabilities but will be only as reliable and trusted as their wireless connection. For these reasons, ACB believes that licensed and unlicensed spectrum must be utilized to form a balanced national spectrum strategy.

ACB thanks NTIA for the opportunity to submit this letter on the furtherance of a national spectrum strategy that balances the benefits of licensed and unlicensed spectrum and the needs of the disability community. If NTIA has any questions regarding this letter, please contact Clark Rachfal at crachfal@acb.org.

Sincerely,

A handwritten signature in black ink, appearing to read 'Clark Rachfal', with a stylized, cursive script.

Clark Rachfal
Director of Advocacy and Governmental Affairs

cc: Grace Abuhamad, Chief of Staff;

Scott Blake Harris, Senior Spectrum Advisor