Getting on the Record with the FCC:
Public Input Process How To's

CSUN Assistive Technology Conference
March 22, 2018

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Rehabilitation Engineering Research Center for Wireless Inclusive Technologies
(Wireless RERC)

Research

Policy

Development
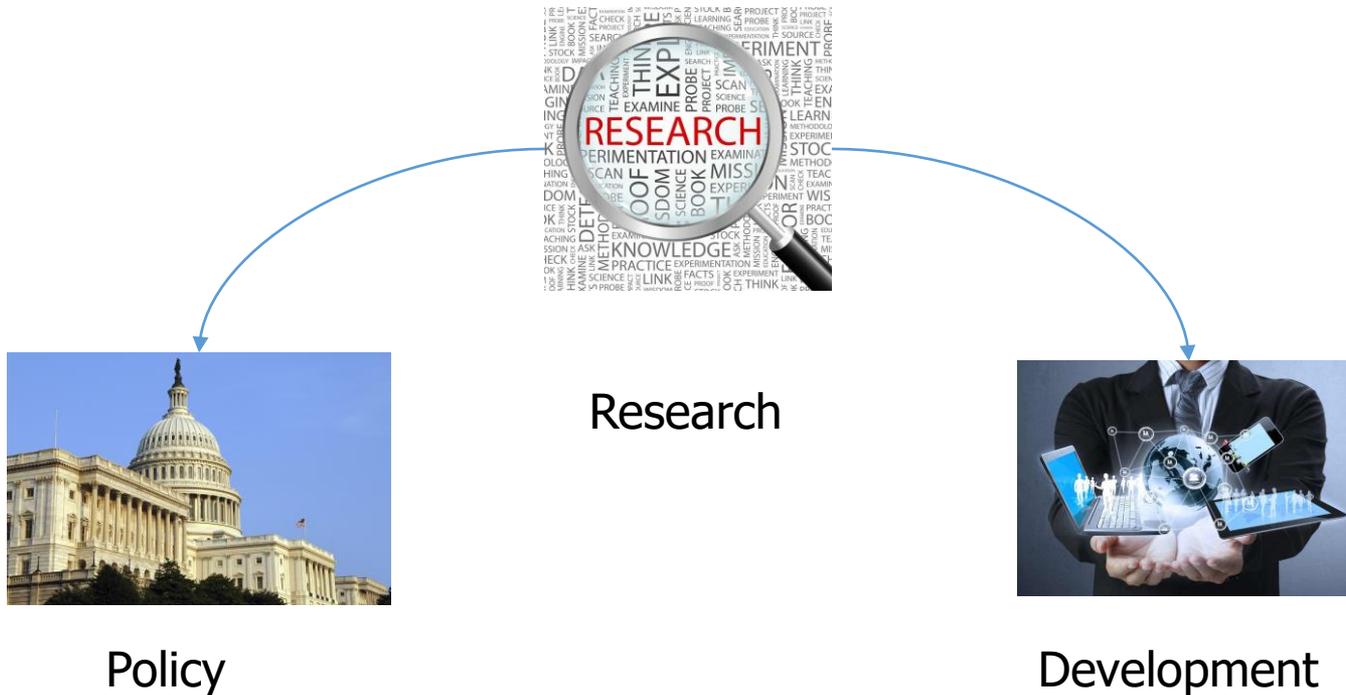
CACP is an R&D policy unit at the Georgia Institute of Technology, with a focus on advanced communications. CACP is the home of the Wireless RERC which aims for a transformative future that will increase inclusion of people with disabilities.

Our process:

Research • Accessible Product Development • Neutral Authority to Inform Policy

FCC Regulatory Process

"Everyone you will ever meet knows something you don't."
Bill Nye the Science Guy

Decisions that affect access to many technologies and services are made at the Federal Communications Commission
- Not unilateral decisions
- Stakeholder input sought via a public comment process
- Submitted comments are considered in developing the rule

The process can be initiated by:
- Congressional statute (broad or specific)
- The Commission identifying a problem that needs addressing
- You (i.e., Petition for rulemaking)

Importance of Participation

Apply inclusive principles early and throughout the rulemaking process.

Reactive to proactive policy requires:
- Anticipation of the outcomes of new tech
- Balanced stakeholder input

Commenters represent industry, all stakeholders and government entities.
- Wireless Emergency Alerts
- Emergency Alert System
- Lifeline/Linkup
- Broadband Deployment

usable
people
desirable

technically
feasible

viable
business

balanced approach

The ladder of participation

high power:controls

helps design service

partner

participant

involved

consulted

informed

placated

manipulated

low power:powerless

increased participation
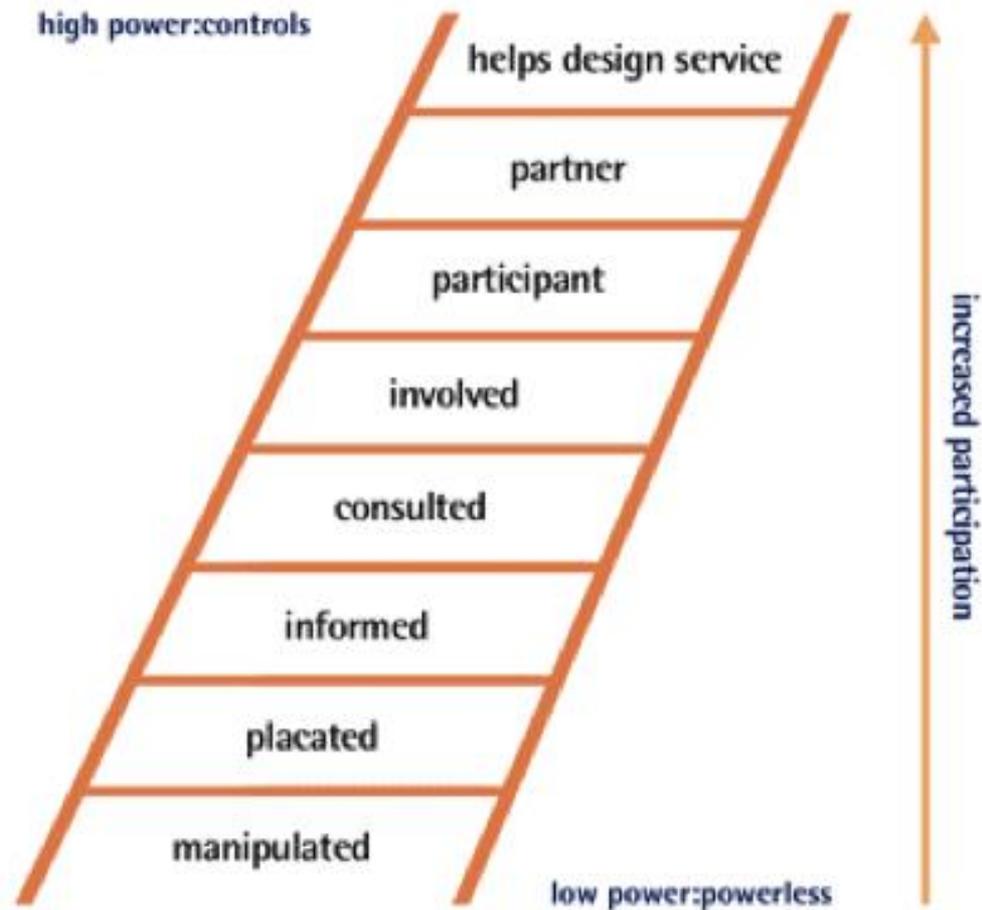
Thorburn, Lewis and Shemmings, 1995

What is influenced?

Policy
- Proposed rules
- Final rules

Industry guidance and standards
- Tech development
- Business practices

The market
- Accessibility features in mainstream wireles technologies

The user experience
- Improved access to and utility of devices ar services
- Increased adoption and decreased abandonment
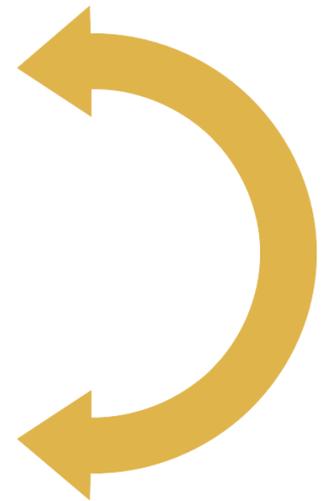
How we do it, You can too!

Keep your ear to the ground.
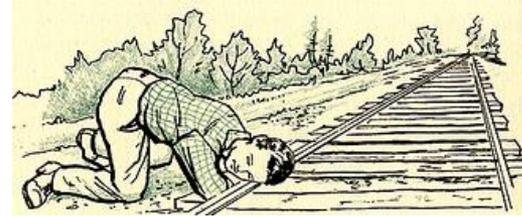
- FCC Daily Digest
    - subscribe@info.fcc.gov
    - Body of the message should read "subscribe digest Your-first-name Your-last-name"
    - Leave the subject line blank.

- Federal Register
    - http://bit.ly/SubscribeToDailyFR

- FCC Monthly Meetings
    - Open Commission Meetings
    - Disability Advisory Committee Meetings
    - https://www.fcc.gov/general/live

- Accessible Formats
    - fcc504@fcc.gov
    - Call 202-418-0530(voice), 202-418-0432 (tty)

The Logistics

Rulemaking Types:
- Notice of Inquiry
- Public Notice
- Notice of Proposed Rulemaking
- Further Notice of Proposed…
- 2nd Further Notice…
- Report & Order

Comment Types:
- Initial
- Reply
- Ex Parte

Federal Register
- Comment Deadlines
- Effective dates
- Compliance deadlines

Federal Communications Commission | FCC 16-127

Before the
Federal Communications Commission
Washington, D.C. 20554

In the Matter of	)	
Wireless Emergency Alerts	)	PS Docket No. 15-91
	)	
Amendments to Part 11 of the Commission's Rules Regarding the Emergency Alert System	)	PS Docket No. 15-94
	)	

REPORT AND ORDER AND FURTHER NOTICE OF PROPOSED RULEMAKING

Adopted: September, 29, 2016   Released: September 29, 2016

Comment Date: (30 days from the date of publication in the Federal Register)
Reply Comment Date: (60 days from the date of publication in the Federal Register)

By the Commission: Chairman Wheeler and Commissioners Clyburn, Rosenworcel and Pai issuing separate statements; Commissioner O'Rielly approving in part, dissenting in part and issuing a statement.

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Writing to Get Cited

Preparation

- Refer to specific sections of the rulemaking

- Respond to specific questions in the rulemaking

Drafting response

- Include support for your recommendations

- Include examples to illustrate your points

- If opposing, provide an alternative solution

Concluding discussion

- Discuss who benefits and how from your recommendations

Example

Paragraph 70: *We seek comment on how to best ensure that community-based alerting exercises address the accessibility needs of individuals with limited English proficiency and individuals with disabilities…and on how to better prepare such communities for emergencies through PSAs.*

Our 2015 WEA Survey collected data on WEA awareness. A majority of all respondents (60%) had heard of WEA prior to the survey. In the 2013-2014 WEA survey data, 59% of all respondents had heard of WEA. This indicates that despite increased WEA-capable phone penetration, WEA awareness levels have remained flat. Respondents without a disability were twice as likely to report having heard of WEA (69%) than those respondents with disability (53%) ($p<0.01$)…

These data suggest that there is significant room for growth regarding educating people with disabilities on the availability of WEA. Due to the differing awareness levels based on disability category, we support targeted outreach, as well as ensuring that outreach materials and methods are appropriate and accessible to the target population.

Submitting Your Comments

Electronic Comment Filing System (ECFS)
https://www.fcc.gov/ecfs/filings
- Online Form
- Proceedings Number
- Name of Filer
- Email address
- Type of Filing
- Address
- Upload prepared comments

Hand or Mail Delivery
See "Addresses" section of the Federal Register Proposed Rule

Conclusion

Change is a process, not an event.

…if you're part of the process.

Contact & Connect

http://www.wirelessrerc.gatech.edu/

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