

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554**

In the Matter of)
)
Accessible Emergency Information, and Apparatus) MB Docket No. 12-107
Requirements for Emergency Information)
And Video Description: Implementation of the)
Twenty-First Century Communications and)
Video Accessibility Act of 2010)

**COMMENTS OF THE
NATIONAL ASSOCIATION OF BROADCASTERS**

I. INTRODUCTION AND SUMMARY

The National Association of Broadcasters (NAB)¹ hereby submits comments on the above-captioned Third Further Notice of Proposed Rulemaking regarding the “audible crawl rule,” which requires video programmers to make visual emergency information provided during non-newscast programming, such as weather radar maps, accessible to persons who are blind or low vision.² The rule has been waived since it was adopted in 2013 because no technical solution for compliance exists and the emergency information provided in such images is typically duplicative of the information conveyed by aurally accessible text crawls that routinely accompany the images.³

¹ NAB is a nonprofit trade association that advocates on behalf of local radio and television stations and broadcast networks before Congress, the Federal Communications Commission and other federal agencies, and the courts.

² *Accessible Emergency Information, and Apparatus Requirements for Emergency Information and Video Description: Implementation of the Twenty-First Century Communications and Video Accessibility Act of 2010; Video Description: Implementation of the Twenty-First Century Communications and Video Accessibility Act of 2010*, Third Further Notice of Proposed Rulemaking, MB Docket No. 12-107 (*rel.* May 1, 2026) (Third Further Notice); 47 C.F.R. § 79.2(b)(2)(ii).

³ See, e.g., *Accessible Emergency Information, and Apparatus Requirements for Emergency Information and Video Description: Implementation of the Twenty-First Century Communications and Video Accessibility Act of 2010; Video Description: Implementation of the Twenty-First Century Communications and Video Accessibility Act of 2010*, MB Docket

NAB supports the FCC’s proposed amendment of the audible crawl rule to allow compliance through the airing of text crawls that provide emergency information that is duplicative of or equivalent to the information conveyed by visual images covered under the rule.⁴ NAB proposed this approach in a Petition for Rulemaking filed in November 2024,⁵ and we agree that adopting this change will finally resolve this issue in a way that recognizes the realities of today’s technology, provides regulatory certainty, and most importantly, ensures access to emergency information for persons who are blind or low vision.⁶

II. A TECHNICAL SOLUTION FOR COMPLIANCE WITH THE AUDIBLE CRAWL RULE REMAINS UNAVAILABLE

Broadcasters believe that all Americans should be able to enjoy video programming and therefore continue to explore technology that can enhance access for persons who are blind or low vision. For example, broadcasters make ongoing efforts to explore technology to improve the aural translation of on-air written text, such as artificial intelligence algorithms that are trained on human voices to understand intonation and grammar.⁷ In the same vein, the television networks that are subject to the FCC’s audio description rules typically exceed

Nos. 12-107 and 11-43, Memorandum Opinion and Order, 30 FCC Rcd 5012, 5022-23 (MB 2015).

⁴ Third Further Notice at ¶ 10.

⁵ *Id.* citing *Petition for Rulemaking and Extension of Waiver of the National Association of Broadcasters*, MB Docket No. 12-107 (filed Nov. 15, 2024) (Petition).

⁶ Third Further Notice at ¶ 16.

⁷ Sirisha Rella, Nvidia Developer Tech Blog, *Exploring Unique Applications of Text-to-Speech Technology* (Apr. 19, 2023), <https://developer.nvidia.com/blog/exploring-unique-applications-of-text-to-speech-technology/>.

the federal requirements in terms of both the quantity and type of programming that is described,⁸ including the voluntary audio description of live programming.⁹

For the same reasons, broadcasters have continued efforts to identify a technical solution for compliance with the audible crawl rule. However, although text-to-speech (TTS) technology can be used effectively to translate emergency text crawls into speech, a parallel solution for visual, non-textual moving images like weather radar maps remains unavailable. And based on NAB's engagement with some entities that are exploring the matter, it remains unclear when a solution may ever come to market, especially one that can be relied on with confidence during an emergency.

NAB has kept in regular contact with a company called AI-Media, which provides AI captioning services to broadcasters.¹⁰ AI-Media also focuses on technology-forward audio description services and continues to improve its automated audio description product for pre-recorded and clipped video programming. NAB understands that the company is making meaningful strides toward better reading, understanding, and translating into speech the images on phone screens, signs, and other platforms, and according to AI-Media, some of these capabilities could potentially be applied to visual images of emergency information covered by the audible crawl rule, especially if such images are pre-prepared.

⁸ Video Description: Implementation of the Twenty-First Century Communications and Video Accessibility Act of 2010, *Second Report to Congress*, 34 FCC Rcd 9350 (2019).

⁹ NBCUniversal Newsroom, *NBCUniversal Enhances Accessibility For Its Coverage Of The Milan Cortina 2026 Winter Olympics* (Jan. 12, 2026), <https://www.nbcuniversal.com/article/nbcuniversal-enhances-accessibility-its-coverage-milan-cortina-2026-winter-olympics>.

¹⁰ More information about AI-Media can be found here: <https://www.ai-media.tv/>.

The Third Further Notice specifically invites comment on the potential technology of Bridge Multimedia,¹¹ a company that focuses on making educational programming, arts and entertainment, corporate communications, gaming, and AI technology more inclusive through accessibility.¹² Bridge met with FCC staff on March 5, 2026, to demonstrate its “Weather Brain” technology, which Bridge states “can translate maps, graphics, and other non-textual visual information into audio using AI with human review.”¹³ Bridge provided a similar demonstration to NAB earlier this year. We understand that Bridge is making structured progress toward translating visual, non-textual emergency information into useful spoken output, including through AI-assisted analysis with human review, but at this time, Bridge is not representing that a fully automated, turnkey, solution for compliance with the audible crawl rule is commercially deployable. NAB is hopeful that Bridge can overcome the remaining challenges to translating moving visual emergency information into speech.

Some of these challenges center on the immediacy of the information in a visual image to be translated into speech. Any system for making the information in images covered by the audible crawl rule accessible must be extremely timely because blind and low vision individuals will rely on such information during emergencies. As of today, it appears that technology may be moving towards a mechanism for effectively translating pre-recorded moving images or clips into speech; however, doing so for live dynamic images is more complex and yet to be perfected.

¹¹ Third Further Notice at ¶ 12 n.51.

¹² More information about Bridge Multimedia can be found here: <https://bridgemultimedia.com/>.

¹³ Letter from Matthew Kaplowitz, President and Chief Creative Office, Bridge Multimedia, to Marlene H. Dortch, Secretary, FCC (Apr. 3 and 9, 2026).

The relevance of information provided to viewers is also critical. The audible crawl rule requires that the “critical details” regarding an emergency be made accessible to persons who are blind or low vision.¹⁴ A process for converting moving graphics to speech must be able to identify and reduce the most pertinent emergency information in an image into accessible text, and exclude unnecessary information, such as information that is irrelevant to viewers who are unlikely to be affected by an emergency but are located within a TV station’s service area. Finally, even if these kinds of problems can be resolved, it remains uncertain how a television station would deliver the aural translation of a moving image without disrupting other audio description or non-English language programming.

Thus, as the FCC states, a complete, automated, live-broadcast solution for all forms of visual, non-textual emergency information, including live dynamic radar and similar graphics, is not currently available, and the timeframe of when such a solution may be developed is still uncertain.¹⁵ We note that the FCC’s conclusion is supported by comments on NAB’s Petition from numerous television station groups that are extremely familiar with recent developments in broadcast technology.¹⁶

NAB understands that advocates for persons who are blind or low vision have concerns about the pace of advancement towards such a solution.¹⁷ For over a decade, NAB

¹⁴ Note to 47 CFR § 79.2(a)(2).

¹⁵ Third Further Notice at ¶ 12.

¹⁶ Comments of Gray Local Media, Inc., MB Docket No. 12-107 (Dec. 26, 2024), at 4-5; Comments of the Society of Broadcast Engineers, Inc., MB Docket No. 12-107 (Dec. 26, 2024), at 2; Joint Reply Comments of the Four Affiliates Association, MB Docket No. 12-107 (Dec. 18, 2024), at 2; Comments of the Joint Broadcasters, MB Docket No. 12-107 (Dec. 13, 2024), at 2-3.

¹⁷ Comments of the American Foundation for the Blind (AFB) and the American Council of the Blind (ACB), MB Docket No. 12-107 (Dec. 26, 2024), at 2.

has engaged with potential developers of a solution,¹⁸ and regardless of this proceeding's outcome, we have no plans to reduce our efforts. Moreover, as discussed separately with ACB, NAB herein commits to a higher degree of direct, sustained collaboration with blind and low vision stakeholders in evaluating potential technical solutions. We agree with ACB that progress could be advanced by more consistent engagement with the blind and low vision community in exploring and testing potential solutions for the aural presentation of visual emergency information.

Accordingly, the Commission's question in the Third Further Notice whether it should mandate NAB's continued investigations into potential technical solutions is unnecessary.¹⁹ Broadcasters have overriding business incentives to reach as many viewers as possible which already ensure that stations will pursue ways to translate visual emergency information into speech, and consumer advocates will continue to push for enhanced access. Instead of more rules or collecting more status reports, NAB respectfully submits that the FCC should let the technology marketplace continue to work.

III. THE FCC CORRECTLY CONCLUDES THAT REQUIRING A MANUAL APPROACH TO COMPLYING WITH AUDIBLE CRAWL RULE IS IMPRACTICAL

AFB and ACB have stated that the audible crawl rule does not necessarily require an automated solution;²⁰ however, the Media Bureau has found that mandating a manual solution would be burdensome for broadcasters and lead some TV stations to stop displaying visual emergency information altogether.²¹ The FCC is correct, as we have already

¹⁸ In fact, only a month ago, NAB connected one vendor with a broadcaster about conducting a pilot program at their station.

¹⁹ Third Further Notice at ¶ 12.

²⁰ AFB/ACB Comments at 2.

²¹ *Accessible Emergency Information, and Apparatus Requirements for Emergency Information and Video Description: Implementation of the Twenty-First Century*

seen the results of letting the audible crawl rule take effect for a brief period in November 2024 when the rule waiver at the time expired before the FCC granted an expedited retroactive waiver.²² Given the impracticality of manual compliance with the rule, TV groups felt compelled to quickly change course during this period, instructing their stations to pause the display of visual emergency information graphics to avoid potential FCC enforcement for failure to make such graphics accessible.²³ Although stations take pride in their efforts to ensure access to emergency information for persons who are blind or low vision, it would be unduly burdensome to force stations to manually translate such images into speech, especially during the “stressful and time-pressured circumstances of covering an emergency.” They simply lack the resources and staff to manage the task.

Of course, causing stations to forego the use of visual emergency images would only deprive all viewers of such programming, including persons who are deaf or hard of hearing, and artificially constrain broadcasters’ weather reporting capabilities. Rather than benefit viewers, implementing the audible crawl rule in its existing form would lead to a reduction in the amount of emergency information that broadcasters provide.²⁴

IV. NAB SUPPORTS THE FCC’S PHRASING OF THE PROPOSED RULE CHANGE

The Commission seeks comment on amending the audible crawl rule by adding the text: “With regard to visual but non-textual emergency information, this requirement is met if

Communications and Video Accessibility Act of 2010, MB Docket No. 12-107, Memorandum Opinion and Order, 38 FCC Rcd 4982, 4987 (MB 2023).

²² Third Further Notice at ¶ 7.

²³ Reply Comments of NAB, MB Docket No. 12-107 (Jan. 9, 2025), at 3.

²⁴ *Id.* at 4.

a textual crawl provides emergency information duplicative of or equivalent to the visual but non-textual emergency information, so long as the textual crawl is also conveyed aurally.”²⁵

NAB supports this phrasing because it will require broadcasters to ensure access to emergency information but allows them flexibility to create crawls consistent with their editorial discretion to cover an emergency. For example, an emergency like a flood or industrial explosion that is more likely to affect a defined area may be relatively simple to present in a graphic image,²⁶ and in turn, easier to present in a text crawl that provides information that is duplicative of the information conveyed by an image. On the other hand, a fast-moving hurricane or wildfire may be more difficult to fully capture in a moving image. In these cases, NAB believes that a well-written text crawl that may not directly duplicate the information in an image can often provide information and instructions that are more detailed than the information in an image.

Accordingly, we support use of the conjunction “or” between “duplicative of” and “equivalent to” in the proposed amendment because this approach will promote effective news coverage of emergencies, while a more restrictive phrasing could deter stations from displaying visual images about emergencies in some instances if they lack certainty in their ability to exactly duplicate the information in an image.

V. CODIFYING NAB’S PROPOSED DRAFT BEST PRACTICES IS UNNECESSARY

In our Petition, NAB explained that broadcasters rarely display visual images about an emergency during non-newscast programming alone, as nearly all such images are accompanied by accessible text crawls. If an image is displayed for a long time without such text crawls, accessibility problems can arise. Thus, NAB created draft best practices to

²⁵ Third Further Notice at ¶ 14.

²⁶ 47 CFR § 79.2(a)(2).

provide recommendations about the content and frequency of broadcasters' text crawls when they choose to show such a visual image.²⁷ We first shared the draft best practices with AFB and ACB in late 2024, before filing our Petition, and regardless of this proceeding's outcome, we will continue working with them to refine the best practices. Thereafter, we will share the best practices with television groups and push the education of stations on the implementation of these recommendations into their emergency news coverage.²⁸

Although the best practices will be a useful resource, we believe it is unnecessary and even detrimental to codify them.²⁹ First, local broadcasters are most familiar with the needs and interests of their viewers. For example, different stations may treat emergencies differently based on their location and audience's familiarity with similar events in the market (e.g., a station in Las Vegas may cover a snowstorm differently than a station in Syracuse).³⁰ Second, broadcasters already have incentives to provide the most relevant and critical emergency information to their viewers, given the importance of emergency news coverage to winning the loyalty of viewers in today's competitive marketplace.³¹ Third, the best practices focus on the content and frequency of text crawls that accompany visual

²⁷ Petition at 13.

²⁸ *Id.* at 10.

²⁹ Third Further Notice at ¶ 15.

³⁰ Petition at 14-15.

³¹ The Commission asks if it should require text crawls to "accurately and effectively" convey the critical details about an emergency, as offered in NAB's Petition. Third Further Notice at ¶ 15. Such a specific qualifier is unnecessary as it is captured within the requirement that text crawls provide emergency information that is duplicative of or equivalent to the information conveyed by a visual image and must ensure access to emergency information under the FCC's rules.

emergency information, which are journalistic decisions about video programming that must be left to the discretion of broadcasters pursuant to the First Amendment.³²

Finally, the Commission asks if there are any steps it should take to ensure that individuals who are blind or visually impaired are consulted in determining best practices, regardless of whether those best practices are codified.³³ We submit such a mandate is also unnecessary as NAB is already partnering with AFB and ACB to ensure the effectiveness of the best practices.

VI. NAB SUPPORTS THE FCC'S ANALYSIS OF THE BENEFITS AND COSTS OF ADOPTING THE PROPOSED AMENDMENT OF THE AUDIBLE CRAWL RULE

NAB agrees with the Commission that adopting the proposed rule change will ensure that video programmers continue to provide visual but non-textual emergency information during non-newscast programming. As discussed above, we have already seen the negative results of allowing the existing rule to become effective, even for a brief period.³⁴

We also agree that the FCC's proposal will improve regulatory certainty by modifying an unworkable part of a rule and eliminating the need for additional waivers.³⁵ Further, the FCC is correct that amending the rule will not cause harm given the limited circumstances

³² See, e.g., *FCC v. League of Women Voters*, 468 U.S. 364, 378 (1984) (stating that “broadcasters are entitled under the First Amendment to exercise the widest journalistic freedom consistent with their public duties” and stressing how the public relies on broadcasters’ “editorial initiative and judgment”) (citations omitted); see also *Turner Broadcasting Sys., Inc. v. FCC*, 512 U.S. 622, 636 (1994) (asserting that cable operators are entitled to First Amendment protection in exercising editorial discretion over which programs).

³³ *Id.*

³⁴ Third Further Notice at ¶ 15 (citing Petition at 3), 8-9; SBE Comments at 2, 7; Gray Comments at 1.

³⁵ *Id.* (citing Petition at 3); Gray Comments at 3; SBE Comments at 6.

when the audible crawl rule applies,³⁶ and because stations typically run text aurally accessible text that will fulfill the rule.³⁷

Finally, NAB supports the Commission's conclusion that the proposed change to the audible crawl rule would meet the FCC's obligation under the Twenty-First Century Communications and Video Accessibility Act of 2010 (CVAA)³⁸ to create rules that require broadcasters "to convey such emergency information in a manner accessible to individuals who are blind or visually impaired."³⁹ Specifically, the proposal will allow compliance with the audible crawl rule through the airing of emergency-related text crawls that are aurally accessible. Also, as noted in the record, the CVAA does not require a "verbatim aural translation" of visual emergency information.⁴⁰ Thus, we agree with the FCC's finding that the modified rule will satisfy the CVAA by making sure that individuals persons are blind or low vision can access emergency information that is conveyed in moving images.

³⁶ *Id.* (citing Petition at 7 and noting that rule only applies once a situation becomes an emergency but before a station breaks into programming with live voiced reporting).

³⁷ *Id.* (citing ACB/AFB/NAB Nov. 2017 Status Report at 4).

³⁸ Pub. L. No. 111-260, 124 Stat. 2751 (2010) (as codified in various sections of 47 U.S.C.).

³⁹ Third Further Notice at ¶ 16 (citing 47 U.S.C. § 613(g)(2)).

⁴⁰ *Id.* (citing SBE Comments at 5-7); Gray Comments at 8-9.

VII. CONCLUSION

For the reasons stated above, NAB supports the Commission's proposed amendment of the audible crawl rule.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Rick Kaplan", with a long horizontal line extending to the right.

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