



Invited Remarks of CommunicationFIRST Policy Director Bob Williams to the Federal Communications Commission Task Force to Prevent Digital Discrimination

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Gallaudet University, Washington, DC

[Event Link](#)

Good morning. I am Bob Williams, the Policy Director and co-founder of CommunicationFIRST, the nation's only organization led by and for, and dedicated to securing the civil rights, including the telecommunication access and usability rights, of people like me—the estimated 5 million children, youth, working age, and older persons who, due to over two dozen disabilities and conditions that may occur at various points in life, have little to no understandable speech most can comprehend, and as a result, are regarded as having less intellect, less to say, and no need or right to do so, all because others cannot understand them. Many of our members still are subjected to lifetimes of being denied the tools and support necessary to effectively communicate, segregated, institutionalized, completely isolated, denied literacy, quality health care, and worse.

Research suggests that, due to health disparities, Black, brown, non-English-speaking, and other multiply marginalized individuals are more likely to need augmentative communication at some point in life, as well as experience greater disparities and discrimination because of it. What does any of this have to do with broadband access? It has everything to do with it.

I am one of the relatively few people who uses a speech generating device and has had, if not complete, at least some degree of access to the Internet and other digital technologies, since the nineties. And I know how transformative and liberating it can be.

But the vast majority of people who need access to the type of device I use, or other tools and support to express themselves and live their lives are denied access to

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them, and have absolutely no access to the broadband and other technology the Federal Communications Commission (FCC) regulates.

For example, there used to be analog cell phones that some of us could use or at least make do with. I suspect the advent of touch screens and broadband have a lot to do with why these phones and the essential service they afforded us became obsolete overnight.

Broadband, as well as other technologies like artificial intelligence, are double-edged. They can liberate. But their deployment can just as well fortify, and create even more horrendous forms of digital and far deeper societal discrimination and exclusion. Especially when left unregulated and inaccessible.

It is indisputable that digital discrimination on the basis of disability exists, and will only metastasize, leading to greater exclusion, and social death the longer it is left unaddressed. The question is not of whether, but how and to what extent the Infrastructure Act can be used to redress it must be thoroughly probed and answered. The same is true with regard to the Commission's obligations under Section 504. It is urgent that the FCC answer these and similar questions in a transparent and collaborative manner.

We also strongly support the American Association of People with Disabilities's (AAPD) recommendation that the FCC explore current as well as future ways **that it could help subsidize the purchase of augmentative devices like the one I use to access the Internet, video conferencing platforms, and other expressive purposes.** Some of this technology is specifically designed for those who need augmentative and alternative communication (AAC). Depending on someone's fine motor control, off-the-shelf devices and apps also are increasingly being used for the same purpose. Medicaid as well as other public and private plans purchase some of this technology, some of the time, in some states, for some people who can somehow navigate their byzantine, and often biased, processes and requirements. Meryl Alper at Northeastern University has researched and written extensively on how this is particularly harmful to kids from marginalized communities who need AAC. There is every reason to assume this is also true with respect to working age and older adults from these same communities, as well as those who are institutionalized. The FCC could help to eliminate such digital gaps, even by providing matching subsidies in ways that incent uniformity and equity.



If, in fact, after considered review, the Commission concludes that it lacks sufficient authority to provide universal access to broadband by people with disabilities in a manner that enables us to subscribe, use, and benefit from it in an equally effective manner as others, the FCC should work with the Congress, the Administration, the disability and civil rights communities, industry, and others to obtain it. This will likely take years to do. But if this is something that is deemed necessary, the work must begin now. It has taken over 30 years to have DOJ propose rules requiring states and localities to have accessible websites. We must not do the same thing here.

Thank you.