

**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 )

**REPLY COMMENTS OF THE  
NATIONAL ASSOCIATION OF BROADCASTERS**

**I. INTRODUCTION**

The National Association of Broadcasters (NAB)<sup>1</sup> hereby submits reply comments on the above-captioned Third Further Notice of Proposed Rulemaking regarding the “audible crawl rule,” which requires that visual, non-textual emergency information aired during non-newscast programming be made accessible to persons who are blind or low-vision.<sup>2</sup> As the FCC states, the rule has been waived since its enactment in 2013 because a “technical solution to comply . . . is not currently possible . . . and it is uncertain whether or when such a solution may be available.”<sup>3</sup> For more than a decade, broadcasters and viewers alike have

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<sup>1</sup> 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.

<sup>2</sup> *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) (Notice); 47 C.F.R. § 79.2(b)(2)(ii).

<sup>3</sup> Notice at ¶¶ 1 and 12. In addition, the “record shows that the information conveyed through visual images is typically duplicative of the text crawls that are already provided aurally.” *Id.* at p. 9 (Statement of Chairman Brendan Carr).

struggled with the practical challenges of complying with the audible crawl rule, making the Commission's effort to finally resolve this issue both timely and welcome.

We support the FCC's proposal to amend the audible crawl rule to allow compliance through the airing of accompanying, accessible text crawls that provide emergency information that is "duplicative of or equivalent to" the information conveyed by visual images subject to the rule.<sup>4</sup> This approach will ensure access to emergency information while providing broadcasters flexibility to cover emergencies consistent with their editorial judgment and community expectations.<sup>5</sup>

The record also supports the FCC's proposal. The Joint Broadcasters explain that, given the technical limitations on compliance, the current audible crawl rule "provides a perverse incentive for broadcasters to forego the use of non-textual graphic displays, thereby providing less emergency information."<sup>6</sup> They add that the proposed rule change will allay such concerns by providing regulatory certainty and also promote viewer access.<sup>7</sup> Furthermore, ACB et al., which advocate for persons who are blind or low-vision, express no objection to the Commission's approach,<sup>8</sup> subject to certain matters discussed below.

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<sup>4</sup> *Id.* at ¶ 10.

<sup>5</sup> NAB proposed the approach set forth in the Notice in late 2024. Petition for Rulemaking and Extension of Waiver of NAB, MB Docket No. 12-107 (filed Nov. 15, 2024).

<sup>6</sup> Comments of the Joint Broadcasters, MB Docket No. 12-107 (June 15, 2026), at 2. See also Comments of Comments of James E. Scarborough, MB Docket No. 12-107 (June 15, 2026) (stating that he does "not object in principle to replacing an unworkable 'describe the graphic' standard with a more functional standard").

<sup>7</sup> *Id.*

<sup>8</sup> Comments of the American Council of the Blind, American Foundation for the Blind, and the Accessibility Coalition (ACB et al.), MB Docket No. 12-107 (June 15, 2026), at 1-2.

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

The record confirms that a technical solution for compliance with the audible crawl rule does not exist, and that it remains uncertain when a solution may be available.<sup>9</sup> For example, Bridge Multimedia, which has explored this issue for several years, states that its AI-driven “Weather Brain” technology is not yet “a completed, market-ready compliance system for every emergency-information use case [but] should be recognized as meaningful evidence of technical progress, but not as proof that all implementation questions have been answered.”<sup>10</sup>

Bridge describes the important challenges to meeting the demands of emergency communications covered by the audible crawl rule. Any system for making the information in a visual graphic accessible must be exceedingly accurate and timely, must identify the most vital information to affected viewers, and be able to distinguish useful emergency detail from less relevant visual material.<sup>11</sup> It must also support clear spoken output and fit into existing broadcast workflows without introducing confusion or delay.<sup>12</sup> Bridge also notes the importance of human review in an AI process to help confirm whether the system has identified the correct location, severity, timing, and other critical details of an emergency.

Thus, although progress is underway,<sup>13</sup> more work is needed and NAB looks forward to continue working with the accessibility community and software developers toward industry deployment of an automated solution for compliance with the audible crawl rule.

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<sup>9</sup> Joint Broadcasters Comments at 1-2.

<sup>10</sup> Comments of Bridge Multimedia, MB Docket No. 12-107 (June 15, 2026), at 1-2.

<sup>11</sup> Bridge Comments at 2. See also Comments of NAB, MB Docket No. 12-107 (June 15, 2026), at 4-5.

<sup>12</sup> Bridge Comments at 2.

<sup>13</sup> *Id.* at 3. A company named SineSix filed comments stating that it has developed an AI-enhanced accessibility solution designed to assist broadcasters in meeting the Audible

### III. THE PROPOSED AMENDMENT OF THE AUDIBLE CRAWL RULE WILL ENSURE ACCESS TO VISUAL EMERGENCY INFORMATION

The FCC proposes to allow compliance with the audible crawl rule if a TV station airs aurally accessible text crawls that provide emergency information that is “duplicative of or equivalent to” the information conveyed by a visual image.<sup>14</sup> ACB et al. urge the FCC to define the quoted phrase with enough specificity to ensure that blind and low-vision viewers receive the critical emergency information that is conveyed to the general viewing audience by such images.<sup>15</sup> They support an approach that preserves “meaningful, timely, and actionable access” to the information conveyed visually, “not merely the presence of a crawl or graphic.”<sup>16</sup> NAB agrees. There is no incentive for a TV station to short-change their general viewing audience with less information in a text crawl than a visual image subject to the rule. NAB further agrees with ACB et al.’s understanding of the terms “duplicative of” and “equivalent to.” They state that the former may refer to situations in which same critical information shown visually is also conveyed through a crawl, while the latter may allow different wording or format, but the viewer receives the same practical understanding about a situation.<sup>17</sup> These views closely track NAB’s comments on this issue.<sup>18</sup>

ACB et al. recommend that the FCC identify “core information elements” that should be included in a text crawl that accompanies a visual image subject to the audible crawl rule, and proposes a list of ten pieces of information that should be provided, such as the

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Crawl Rule obligations. Comments of SineSix, MB Docket No. 12-107 (June 15, 2026). NAB reached out to SineSix last week to learn more about its technology and is working with SineSix to schedule a demonstration.

<sup>14</sup> Notice at ¶ 10.

<sup>15</sup> ACB et al. Comments at 2.

<sup>16</sup> *Id.* at 10.

<sup>17</sup> *Id.* at 11-12.

<sup>18</sup> NAB Comments at 7-8.

type, location, severity, and timing of emergency, and what kind of protective action a viewer should take. They ask the FCC to establish recommended practices to help guide stations' creation of text crawls,<sup>19</sup> and provide an appendix of examples of "what local station staff should write or ensure is conveyed audible," when a visual image is displayed regarding different kinds of emergencies (e.g., tornado warnings, heavy snow, hazardous materials).

Although well-intentioned, such recommendations are unnecessary. First, Section 79.2(a)(2) of the Commission's rules already define the "emergency information" in a visual graphic that must be made accessible under the audible crawl rule as "information, about a current emergency, that is intended to further the protection of life, health, safety, and property, *i.e.*, critical details regarding the emergency and how to respond to the emergency," and provides a list of examples of various types of covered emergencies.<sup>20</sup> A note to that rule states that "critical details" include, but are not limited to, specific details regarding the areas that will be affected by the emergency, evacuation orders, detailed descriptions of areas to be evacuated, specific evacuation routes, approved shelters or the way to take shelter in one's home, instructions on how to secure personal property, road closures, and how to obtain relief assistance."<sup>21</sup>

The emergency information mandated in Section 79.2 largely dovetails with the information that ACB et al. suggest should be included in text crawls that accompany a visual image. To the extent that ACB et al. want to change the mandated content of emergency information, an additional rulemaking proceeding would be required. If ACB et al. instead seek to create some best practices to help inform broadcasters' coverage of

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<sup>19</sup> ACB et al. Comments at 14-15.

<sup>20</sup> 47 C.F.R. § 79.2(a)(2).

<sup>21</sup> Note to 47 C.F.R. § 79.2(a)(2).

emergencies for the benefit of blind or low-vision viewers, NAB would be eager to work with ACB et al. and other accessibility stakeholders, although we do not believe government involvement in such a process is needed or appropriate.

Second, as the Joint Broadcasters state, “local broadcasters know their local audiences best, and issues about the content and frequency of text crawls should be left to a station’s journalistic discretion. . . Broadcasters also have a business incentive to provide quality, accurate, accessible emergency information as part of their programming feeds so as to differentiate their local programming from competitors.”<sup>22</sup> Local TV stations already exercise their best journalistic judgment when providing news and information about emergencies. An overly proscriptive government-directed approach to the content of audible crawls that accompany visual images could deter TV stations from choosing to display such images, reducing emergency information for all viewers. We have already seen this play out when the current audible crawl rule became effective for a brief period in 2024, leading many TV stations to suspend the display of emergency-related visual graphics.<sup>23</sup>

Finally, ACB et al. state that the frequency of text crawls that accompany emergency-related visual images is important to providing viewers with a timely opportunity to respond.<sup>24</sup> NAB agrees, and for this reason has previously offered recommendations for the frequency of such crawls.<sup>25</sup> However, we strongly disagree with the frequency of crawls proposed by ACB et al., which calls for stations to run text crawls every minute for an

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<sup>22</sup> Joint Broadcasters Comments at 3.

<sup>23</sup> Notice at ¶ 15.

<sup>24</sup> ACB et al. Comments at 18.

<sup>25</sup> NAB Petition at 17.

emergency classified as “warnings,” every two minutes for “advisories,” and every three minutes for “watches.”<sup>26</sup>

A required heavy rotation of the sort ACB et al. propose would almost certainly lead stations to stop displaying emergency-related visual images because running crawls so frequently would be counter-productive and unduly disruptive of programming. Too many crawls would overload viewers with repetitive information, causing them to either tune out truly important news and information, or alternatively, cause undue panic. For example, the National Weather Service may issue a Winter Weather Advisory if one inch of snow is forecast to fall during rush hours in the Washington, DC area.<sup>27</sup> It would not be effective or appropriate for a TV station to run text crawls every two minutes for that kind of fairly minor situation. That said, NAB remains available and open to work with accessibility stakeholders on crafting reasonable best practices for the airing of text crawls in connection with visual images regarding emergency situations.

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<sup>26</sup> ACB et al. Comments at 18-19.

<sup>27</sup> See National Weather Service, *Watch/Warning/Advisory Definitions, Baltimore/Washington*, available at <https://www.weather.gov/lwx/warningsdefined>.

**IV. 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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