

IFE Advocates Round 1 Specification Document (Draft)
Discussed in July 11-12 Plenary Meeting; reviewed and cleared by Advocates
via email subsequent to meeting
(This version: 07/14/2016)

The document is intended to represent the requirements and expectations of passengers with disabilities with respect to the accessibility of IFE systems (hardware and software) and content. The views expressed below are aligned only to the round-one issues described in the *Sequenced List of IFE/IFComs Issues* document that was distributed to the IFE subcommittee prior to the July 11/12 meeting. These round-one issues are pasted below, and the advocates' response is then presented. This initial document focuses on setting expectations regarding IFE content and, to a lesser degree, IFE systems, relative to the needs of passengers with sensory impairments (i.e., passengers who are deaf, hard of hearing, blind or visually impaired). Subsequent versions of this document will contain views on round-two issues, including but not limited to the accessibility of IFE systems themselves. In the end, the goal is to ensure that 100% of IFE offerings are accessible via closed captions and audio descriptions, and that the systems used to deliver IFE content to passengers are accessible to all users.

ROUND 1 ISSUES

IFE SYSTEMS

- 1) **Seatback displays:** Should the rule require closed-captioning/audio-description capability on seatback displays for:
- a) New IFE installations?
 - b) Upgrades to an existing IFE installation?
 - c) Retrofits of existing IFE installations?

RESPONSE

A phased-in approach, beginning when the regulations take effect, should be considered. In the first phase:

- All orders for new aircraft with seat-back displays must be equipped with IFE systems that are capable of conveying closed captions and audio descriptions to passengers.
- IFE systems (both hardware and software) that do not meet DoT requirements and which were installed on or after (a date to be determined), must be upgraded or replaced with systems that comply with DoT regulations by a specific date or a period to be determined. Beyond this date, airlines must provide accessible IFE systems to passengers on all aircraft.
- Inaccessible legacy systems which were installed before (a date to be determined) will not be required to upgrade to accessible IFE systems solely for the purpose of satisfying DoT IFE-accessibility regulations since they are already nearing the end of their lifecycles. However, once the IFE system is due for a regularly scheduled update

(software or hardware) and/or if an aircraft undergoes a reconfiguration or renovation for any reason, an accessible IFE system must then be installed to replace the legacy IFE system, if one exists on the aircraft. If an IFE system is not currently installed on the aircraft, an accessible system need not be installed solely to satisfy DoT regulations. (See [14 CFR 382.71\(b\)](#); "You must ensure that any replacement or refurbishing of the aircraft cabin or its elements does not reduce the accessibility of that element to a level below that specified in this Part.")

- On any aircraft that have inaccessible, legacy IFE systems, accessible alternative IFE systems must be available for passengers that request them until (and only **if**) the legacy system is replaced with an accessible system, as described under the terms of the previous bullet. This alternative system must provide the same offerings as the inaccessible system used by other passengers.
- Airlines must provide passengers with information regarding the accessibility of a plane's IFE system (either seat-back or alternative) in any material describing a specific flight (e.g., in a schedule or route map).

2) Personal customization: Should the rule require carriers to enable passengers to customize IFE/IFComs text-based captions on seatbacks, portable electronic devices, and entertainment applications? If so, what customization options should be required?

- a) New IFE installations?
- b) Upgrades to an existing IFE installation?
- c) Retrofits of existing IFE installations?

RESPONSE

- Seat-back display IFE systems as well portable or other alternative IFE devices that are distributed to passengers by airline staff must support the caption style requirements outlined in [FCC 12-9](#), §79-103, *Closed-caption decoder requirements for all apparatus* ([read summary](#)) that relate to the customization of caption display. This includes operating-system-level support for caption customization as well as within apps that passengers use to play multimedia.
- Pertaining to portable or other alternative IFE systems that are distributed to passengers by airline staff, staff must know the location of the hardware, must be able to explain to passengers how it works, and must be able to provide technical support when necessary. Staff must also provide instructions for operating the portable or other alternative IFE system in a printed and/or electronic format.

IFE CONTENT

For each of the following categories of content:

- 1) Movies
- 2) TV (Should the rules distinguish between live TV and cached content?)
- 3) Interstitials (e.g., brief promotional videos, previews, etc.)

should the rule require closed captions and/or audio descriptions for:

- a) New content that has been captioned and/or described and such captions are available to IFE at the time of IFE release;
- b) Older content that has been offered to IFE but for which closed captions and/or audio descriptions were not made available to IFE at the time of IFE release.

RESPONSE

A phased-in approach should be considered. In the first phase, which would begin when the DoT regulations take effect:

- 100% of acquisitions of non-television programming (e.g., movies) must be provided with closed captions and audio descriptions;
- airlines must pass through (i.e., not block or otherwise exclude) existing closed captions or audio descriptions on live television programming that contains these features;
- all materials advertising or promoting the presence of IFE must clearly identify media that is closed captioned or audio described;
- search mechanisms must provide a method for passengers to search IFE libraries or offerings solely for media that is closed captioned and/or audio described.

In the following phase (dates and/or timelines to be determined):

- airlines must provide X percentage of legacy/library content with closed captions and audio descriptions;
- airlines must provide media that meets quality regulations established by [FCC 14-12](#).

In the final phase (dates and/or timelines to be determined):

- airlines must ensure that 100% of all IFE offerings are provided with closed captions and audio descriptions.