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DRAFT IFE/IFC ISSUE LIST

Distributed for discussion at the Second Plenary Meeting of the ACCESS Committee

June 15, 2016

IFE Systems

1. **Applicability:** Should the rule's closed captioning/audio description requirements apply to:
 - a) **New model aircraft for which an inflight entertainment system (IFES) is incorporated?**
 - b) **New airline configurations of an existing airplane model, with identified hardware and/or software changes* to the IFES?**
 - c) **In-service airplanes undergoing a new IFE system installation (where one did not previously exist)?**
 - d) **In-service airplanes undergoing an upgrade to an existing IFE installation with hardware and/or software changes* to the IFES?**

* changes would determine aspects of the rule that would apply

If the rules apply, on what time table for each case?

NOTE: the same questions apply for any proposed rule changes to IFC installations

2. **Seatback displays:** Should the rule require closed captioning on seatback displays?
3. **Portable displays:** Should the rule require carriers who offer IFE content to offer it in a format that will display with closed captioning on portable displays (e.g., tablet, smartphone or laptop)?
4. **Communal screens:** Should open captions be required on communal screens?
5. **IFES hardware interfaces:** Should the rule require IFES hardware (such as physical buttons or switches) to be accessible to users who are deaf or hard of hearing (in order to be notified of audio alerts or messages), with vision impairment (in order to identify and operate controls), and/or with dexterity impairment?
6. **IFES software interfaces:** Should the rule require IFES software (such as touchscreen controls) to be accessible to users who are deaf and hard of hearing (in order to be notified of audio alerts or messages), with limited vision (in order to identify and operate all controls), and/or with dexterity limitations?
7. **Personal customization:** Should the rule require carriers to enable passengers to customize IFE/IFC text-based captions on seatbacks and PEDs? If so, what customization options should be required?
8. **Audio descriptions:** Should the rule require carriers to offer audio descriptions for content conveyed through their IFES? What hardware/software changes might be needed to accommodate audio descriptions?
9. **Cabin announcements on aircraft equipped with IFE:** Should the rule require that IFES have the capability to convey all communications between the crew and passengers (including audio) as on-screen text, including the use of open captions (onscreen text that cannot be disabled by

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pax) to convey all cabin announcements? Consider accurate speech-to-text capability or alternate technology options.

- a) How should airlines accommodate passengers whose PEDs must be stowed during certain portions of the flight (e.g., during takeoff and landing, or rough weather)?

10. Cabin announcements on aircraft not equipped with IFE. What should be required for inflight communications (IFC) if the aircraft is not equipped with an IFE system?

- a) Should such announcements be required to be offered in a format that will appear on PED screens? How will they be transmitted to PED screens?
- b) In the event that self-identified deaf or hard-of-hearing passengers do not have PEDs, should airlines be required to provide passengers with PEDs solely for receiving in-flight communications and accessing IFE?
- c) How should airlines accommodate passengers whose PEDs must be stowed during certain portions of the flight (e.g., during takeoff and landing, or rough weather)?

Content:

11. Captioning and describing old and new content: Should the rule require closed captions and/or audio descriptions in each of the following categories of content:

- a) older content that has been offered to IFE but has not been captioned or described in any format;
- b) new content which has been captioned or described for other markets but not yet for IFE;
- c) new content that has been captioned or described for IFE.

12. Creating captions and audio descriptions exclusively for IFE: Should the rule require that closed captions and/or audio descriptions be made available only if they exist for material purchased for IFE? Should airlines be prohibited from exhibiting IFE content that is not accessible?

13. Captioning English and non-English: Should closed captioning requirements apply:

- a) only to English-language content regardless of origin;
- b) only to English-language content of U.S. origin;
- c) only in the primary language of the carrier;
- d) only in the language(s) in which the carrier communicates with passengers on the flight
- e) to any and all languages in which content is exhibited.

14. Differentiating by program type: Should rules requiring closed captioning differentiate between "Live TV" and cached content?

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- 15. Application of FCC standards to DOT rules:** Should the rule require that carriers comply with accessibility regulations that are already specified by the FCC for other markets or delivery methods?

Jurisdictional:

- 16. Level playing field consideration:** Should DOT rules apply equally to air carriers as defined by Transportation Code 49 U.S.C. 40102? Are there exceptions to certain rules for aircraft flying to or from foreign destinations and/or foreign code-shares of US carriers that are reasonable and do not impact the “level playing field” tenet?

Note: 9 U.S.C. 40102(a)(2) defines “air carrier” as “a citizen of the United States undertaking by any means, directly or indirectly, to provide air transportation.” 49 U.S.C. 40102(a)(21) defines “foreign air carrier” as “a person, not a citizen of the United States, undertaking by any means, directly or indirectly, to provide foreign air transportation.”