International Deaf Emergency
A Deaf-led 501(c)(3) nonprofit · EIN 27-3191911 · Silver Spring, Maryland · ideafe.org

Before the Federal Communications Commission
Washington, DC 20554

In the Matter of Information Collections Being Reviewed by the Federal Communications Commission Under Delegated Authority, OMB Control No. 3060-0175, Section 73.1250, Broadcasting Emergency Information. Federal Register notice of September 1, 2026, FR Doc. 2026-17858; comments due November 2, 2026.

COMMENTS OF INTERNATIONAL DEAF EMERGENCY

1. Who we are. International Deaf Emergency, Inc. (IDE) is a Deaf-led nonprofit corporation organized in Maryland in 2010 and recognized under section 501(c)(3). Its purpose is that deaf, DeafBlind and hard of hearing people are reached by emergency information. IDE has filed this year in PS Docket Nos. 15-91, 15-94 and 25-224 (comments of August 31, 2026, ECFS 26110073861; a written ex parte of September 14, 2026, ECFS 26110076556; reply comments of October 8, 2026, ECFS 26110079993) and in PS Docket Nos. 21-479 and 13-75 (reply comments of September 3, 2026, ECFS 26110075390). These comments respond to the Paperwork Reduction Act notice and are confined to the practical utility, quality, clarity and burden of the collection. IDE supports the extension of the collection and does not ask the Commission to reopen section 73.1250 or section 79.2 here.

2. The collection. Section 73.1250(e) requires a report in letter form, forwarded to the FCC's main office under 47 CFR 0.401(a) immediately upon cessation of an emergency during which a station transmitted point-to-point messages at the request of public officials, or an AM station used its daytime facilities at night. The report sets forth "the nature of the emergency, the dates and hours of the broadcasting of emergency information, and a brief description of the material carried during the emergency." The notice estimates 50 such reports a year. Separately, paragraph (h) requires that emergency information transmitted by a TV or Class A TV station "shall be transmitted both aurally and visually or only visually," by "any method of

visual presentation which results in a legible message conveying the essential emergency information," and gives as examples "slides, electronic captioning, manual methods (e.g., hand printing) or mechanical printing processes." (47 CFR 73.1250(e), (h).)

3. Practical utility. For the reports a TV or Class A TV station files, the collection records that emergency information was broadcast, when, and what it said, but not how it was made visible. Approximately 15 percent of American adults (37.5 million people ages 18 and over) report some trouble hearing (National Institute on Deafness and Other Communication Disorders, Quick Statistics About Hearing, Balance, and Dizziness), and for Deaf and DeafBlind viewers the visual presentation required by paragraph (h) may be the only usable channel. The rule already requires the visual presentation; the report simply does not ask which one was used. IDE recognizes that the report is filed only in the circumstances described in paragraph (e), so the gain is modest; but it costs almost nothing, and these are exactly the emergencies in which stations relay messages to help rescue and aid.

4. Quality and utility. The collection has no standardized form (the notice lists "Form Number: N/A"); the report is a letter whose content is set by paragraph (e). IDE therefore asks the Commission to note in the Supporting Statement for this extension, and in any voluntary filing guidance, that for a TV or Class A TV station the "brief description of the material carried during the emergency" may usefully include: (i) which visual method carried the essential emergency information (for example full-screen text, a crawl or captioning); (ii) whether the visual presentation ran at the same time as the aural information; and (iii) whether a sign language rendering was provided. Each is known at the station on the day; IDE expects them to take only a few minutes to note and asks the Commission to assess any added time. IDE does not ask for a new mandatory reporting element.

5. Clarity. Paragraph (h) states that the permitted visual methods "include, but are not necessarily limited to" the four text methods it lists. To improve the clarity of the information collected under paragraph (e), IDE asks that the Supporting Statement note that where a TV or Class A TV station provided a sign language rendering alongside a legible text message during an emergency covered by paragraph (e), identifying both in its brief description of the material carried gives the Commission a clearer record of how the emergency information was presented.

6. Burden. IDE takes no position on the Commission's estimate of 50 responses and one hour per response. To minimize the burden of the collection through information technology, IDE suggests that the Commission allow stations to submit paragraph (e) reports electronically, for

example to a designated FCC email address or through the Media Bureau's Licensing and Management System, as an alternative to forwarding a letter to the main office under 47 CFR 0.401(a).

7. Why it matters. The Commission is examining the accessibility of emergency alerts in PS Docket No. 25-224. Knowing how stations make emergency broadcasts visible, even in a small number of reports, is a low-cost way to see whether the visual requirement of paragraph (h) is reaching the people it exists to protect.

Respectfully submitted,

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