Dec. 2, 2014

Zita Johnson-Betts
Deputy Section Chief
Disability Rights Section
Civil Rights Division
U.S. Department of Justice
1425 New York Avenue, N.W., Suite 4039
Washington, D.C. 20005

Re: Comments on Proposed Rulemaking, Nondiscrimination on the Basis of Disability by Public Accommodations—Movie Theaters; Movie Captioning and Audio Description, RIN 1190-AA63, CRT Docket No. 126

Dear Ms. Betts:

The Consortium for Citizens with Disabilities (CCD) Rights Task Force submits this comment in response to the above-referenced proposed rulemaking. CCD is a coalition of national disability organizations working for national public policy that ensures the self-determination, independence, empowerment, integration and inclusion of children and adults with disabilities in all aspects of society.

The Rights Task Force strongly supports the joint comments submitted by the Alexander Graham Bell Association, the Association of Late Deafened Adults, the Hearing Loss Association of America, the National Association of the Deaf, and the National Association of Theatre Owners. It is striking that national organizations representing individuals who are deaf and hard of hearing have reached agreement with theater owners on a set of positions concerning the issues presented by the proposed rule; these positions deserve great weight in light of the support they enjoy from important stakeholders on both sides. We also note that captioning increases access as well for individuals with certain other disabilities, such as sensory processing disabilities.
Sincerely,

Jennifer Mathis
Bazelon Center for Mental Health Law

Mark Richert
American Foundation for the Blind

Curt Decker
National Disability Rights Network

Sandy Finucane
Epilepsy Foundation of America

Co-chairs, CCD Rights Task Force