

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554**

In the Matter of)
)
Accessible Emergency Information, and Apparatus)
Requirements for Emergency Information)
And Video Description: Implementation of the) MB Docket No. 12-107
Twenty-First Century Communications and)
Video Accessibility Act of 2010)

**PETITION FOR RULEMAKING AND EXTENSION OF WAIVER OF THE
NATIONAL ASSOCIATION OF BROADCASTERS**

I. Introduction and Summary

Pursuant to 47 C.F.R. § 1.401, the National Association of Broadcasters (NAB)¹ submits this petition for rulemaking regarding Section 79.2(b)(2)(ii) of the Commission’s rules, which requires that visual, non-textual emergency information (e.g., weather radar maps) provided during non-newscast video programming be made aurally accessible (audible crawl rule).² The rule was adopted on April 8, 2013, with an original effective date of May 26, 2015,³ but has been waived to the present day because a technical solution for automated descriptions of the information in such graphics does not exist.⁴ The current

¹ 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.

² 47 C.F.R. § 79.2(b)(2)(ii).

³ *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*, MB Docket Nos. 12-107 and 11-43, Report and Order and Further Notice of Proposed Rulemaking, 28 FCC Rcd 4871 (2013) (2013 Emergency Information Order).

⁴ See, e.g., *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*

waiver expires on November 26, 2023. The FCC has also noted that the emergency information conveyed by such graphics is in most cases duplicative of the information provided in textual crawls, which are aurally accessible, thus helping to ensure access to emergency information while the rule has been waived.⁵

Below, NAB explains that it remains impossible for stations to continue to provide important emergency information to viewers while complying with the audible crawl rule as written. While a waiver would allow stations to continue to provide critical information, it would also likely have limited downside because it both applies to a very narrow set of circumstances and NAB has developed best practices to ensure no viewers are left behind. During the “emergency” periods when the rule applies, stations that display visual images typically run text crawls that provide emergency information equivalent to the information conveyed by an image, if not more detailed.

Broadcasters are extremely proud of their emergency operations, and have significant concerns for the public if the audible crawl rule takes effect. The FCC has stated that, if a station displays a visual image that conveys information duplicative of that provided in text crawls, it need not take additional steps to comply with the audible crawl rule.⁶ However, the rule itself is much less clear. Given the fear of significant enforcement fines and/or penalties, many stations feel compelled to apply the most cautious reading of

the Twenty-First Century Communications and Video Accessibility Act of 2010, MB Docket Nos. 12-107 and 11-43, 38 FCC Rcd 4982 (2023) (2023 Waiver Order).

⁵ *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*, MB Docket Nos. 12-107 and 11-43, Memorandum Opinion and Order, 33 FCC Rcd 5059, 5065-66 (2018 Waiver Order); 2023 Waiver Order, 38 FCC Rcd at 4986.

⁶ 2018 Waiver Order, 33 FCC Rcd at 5065-66.

the rule, which would require stations to directly or exactly aurally describe the information in moving images by converting the images to speech. However, that process is currently technologically impossible.⁷ Also, the rule does not mention that compliance can be met by running separate text crawls that provide equivalent information. The result is that many broadcasters will cease providing this important service rather than risk an FCC enforcement action.

NAB submits that another extension of the existing waiver while a viable technical solution is essential as long as the rule is in place, but also urges the FCC to concurrently reform the underlying rule. In particular, NAB requests a change to the audible crawl rule to specify that compliance is fulfilled if a station provides textual crawls that provide emergency information duplicative or equivalent to the information conveyed by the visual image. We believe this approach would provide a more practical, permanent resolution of this decade-long quandary, and afford broadcasters the regulatory certainty needed to continue displaying such graphics, while ensuring access to emergency information.

To facilitate compliance with this proposed rule change, NAB has created the attached draft best practices guide to help ensure that the content and frequency of text crawls provide access to emergency information equivalent to that conveyed by a visual image. NAB has shared the draft best practices with advocates for blind and low vision individuals and looks forward to incorporating their input in the final product.

In addition, pursuant to 47 C.F.R. §§ 1.3 and 14.5, NAB requests a brief extension of the existing waiver of the audible crawl rule for 18 months while the Commission considers

⁷ 47 C.F.R. § 79.2(b)(2)(ii).

this petition, subject to the Commission’s discretion to terminate the waiver earlier depending on the outcome of this proceeding.

II. Development of a Technical Solution for Complying with the Audible Crawl Rule Remains Uncertain

The audible crawl rule requires television stations to ensure that emergency information provided visually during non-newscast programming is accessible to persons who are blind or low vision.⁸ “Emergency information” is defined as information about a current emergency that is intended to further the protection of life, health, safety, and property, i.e., the critical details of the emergency and how to respond.⁹ The rule has been waived for its entire existence because there is no viable technical solution for creating accurate and timely aural descriptions of the emergency information in radar maps and other graphics over current broadcasting facilities.¹⁰ This obstacle has been recognized by the FCC’s Disability Advisory Committee,¹¹ and confirmed by numerous broadcasters.¹²

⁸ 47 C.F.R. § 79.2(b)(2)(ii).

⁹ *Id.* at § 79.2(a)(2). The rule lists examples of a current emergency, including tornadoes, floods, widespread fires power failures, and warnings and watches of impending changes in weather. *Id.*

¹⁰ See, e.g., *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 Twenty-First Century Communications and Video Accessibility Act of 2010*, Memorandum Opinion and Order, 31 FCC Rcd 12540 (2016) (extending waiver to May 26, 2016 to May 26, 2018); 2018 Waiver Order, 33 FCC Rcd at 5055 (extending waiver to May 26, 2023); 2023 Waiver Order, 38 FCC Rcd at 4986 (extending waiver to November 26, 2024).

¹¹ *Recommendation of the Disability Advisory Committee, Best Practices for Graphical Emergency Alerts* (Feb. 28, 2018), available at <https://www.fcc.gov/disability-advisory-committee> (DAC2, 2016-18 Term) (DAC Recommendation).

¹² Reply Comments of CMB Media Corporation at 2, MB Docket No. 12-107 (May 1, 2023); Reply Comments of the Four Affiliates Association 3-5, MB Docket No. 12-107 (May 1, 2023); Reply Comments of CMB Media Corporation at 2, MB Docket No. 12-107 (May 1, 2023) Reply Comments of Gray Television, Inc. at 1, MB Docket No. 12-107 (May 1, 2023).

Unfortunately, there is still no technological means of meeting the rule's requirements today. To convert information conveyed in images into accessible speech, a broadcaster must first convert the video programming into audio, integrate that audio into their facilities, route the audio through their systems, and code the audio onto a secondary audio stream for broadcast.¹³ Current technology makes this possible for textual images like crawls, but doing so for visual, non-textual moving images like a radar map is not yet feasible because the software that creates these kind of graphics does not contain metadata text files that can be converted into text and then used to create an audible crawl.¹⁴ We have discussed this issue with the leading providers of weather information to television stations, as well as large broadcast companies that have sophisticated weather news operations, none of whom can identify a solution.¹⁵

We have also met multiple times with Ai-Media, a global leader in the development of artificial intelligence (AI)-powered captioning and translation solutions. Ai-Media is a major provider of accessibility products and services to broadcasters and well-positioned to explore a technical solution for complying with the audible crawl rule.¹⁶ The company has

¹³ Status Report of the American Council of the Blind the American Foundation for the Blind, and the National Association of Broadcasters at 5, MB Docket No. 12-107 (Nov. 22, 2017) (2017 Status Report).

¹⁴ *Id.*

¹⁵ Letter from Joshua N. Pila, Gray Television, Inc., to Ms. Marlene H. Dortch, Secretary, FCC, MB Docket No. 12-107 (May 1, 2023) (“Gray’s engineering teams are in constant contact with a variety of AI vendors who are working towards many new solutions across a wide variety of broadcast concerns.”); Four Affiliates Reply Comments at 5; Comments of the Society of Broadcast Engineers, Inc. at 1, MB Docket No. 12-107 (filed Apr. 5, 2023).

¹⁶ NAB’s discussions with Ai-Media is evidence of our efforts to answer the consumer advocates’ request for increased outreach to industry leaders in AI. Comments of the American Council of the Blind (ACB) and the American Foundation for the Blind (AFB) at 2, MB Docket 12-107 (April 24, 2023).

informed NAB that it has tested an AI approach to creating audio descriptions for pre-recorded video programming and would be interested in potentially pursuing a similar process for live programming in the future. However, they highlight several challenges that make success uncertain. Most importantly, an AI process for converting the information in images subject to the audible crawl rule would have to be exceedingly accurate and timely because blind and low vision individuals will rely on such information during emergencies. In addition, such images are not usually labeled, so industry would have to start labeling much of an image to minimize the advanced training an AI system would need to translate the image, without increasing the image size or disrupting regular programming.

Another concern is the relevance of information in the image to viewers. Many stations cover large areas, which will make it challenging for an AI process to extract and convert the information that is most pertinent to viewers in the parts of a TV market to be affected by an emergency. We understand that providing too little information to blind and low vision viewers would not be helpful (i.e., “a radar map is displayed in the lower left of the screen”), but providing too much information would also present problems. Yet another consideration is when to aurally describe the emergency information in an image without disrupting the programming, and how often to describe the information, if an image is shown for a long time. All of these questions will take time to answer, assuming an AI-based solution can be created at some point.

Thus, although NAB hoped that some kind of technical solution for complying with the audible crawl rule could be developed during the past decade, we have come to understand that a viable solution may not exist for quite some time. Given this uncertainty, we believe that while another waiver is needed as long as the rule is in place, the Commission should adopt a longer-term solution rather than continue what will be an endless cycle of waiver

requests. To that end, NAB requests a minor change to the rule that will allow the continued use of such highly beneficial moving images while ensuring access to emergency information.

III. Clarifying the Audible Crawl Rule to Allow Compliance Through Accompanying Text Crawls Would Help Ensure Continued Access to Emergency Information

The audible crawl rule requires that television stations make emergency information provided during regular, non-newscast programming accessible to persons who are blind or low vision, and defines emergency information as information about a “current” emergency that is intended to further the protection of life, health, safety, and property.¹⁷ Thus, the rule applies only in fairly narrow circumstances, specifically, once the severity, location, and timing of an event are certain enough to be considered a current emergency, but before the event becomes serious enough for a station to break into programming with live voiced reporting.

During those often brief periods when the rule would apply, the record shows that the emergency information conveyed by a visual image is in most cases duplicative of the information provided in accompanying text crawls.¹⁸ The graphic images that stations display rarely, if ever, provide information not captured in crawls and other content, and are usually shown as a way to reenforce or complement text crawls.¹⁹

¹⁷ 47 C.F.R. § 79.2(b)(2)(ii).

¹⁸ Four Affiliates Reply Comments at 5; Some stations also use banners and information boxes to inform viewers about severe weather and other emergencies. CMG Reply Comments at 4-5.

¹⁹ Petition for Extension of Waiver of the National Association of Broadcasters at 10, MB Docket No. 12-107 (Apr. 5, 2023).

In this way, broadcasters satisfy the goal of the audible crawl rule to help protect the lives and property of viewers who are blind or low vision safe.²⁰ The Commission has stated, if the critical information about an emergency conveyed in graphic images is duplicative of the information provided in a crawl, “broadcasters do not need to take further steps to be in compliance with the Audible Crawl Rule.”²¹ However, the rule itself does not mention separate text crawls that provide duplicative information as a means to comply. Also, the wording of the rule may be read as a requirement to provide an aural representation “of” the information in the image by somehow directly describing the content in an image or converting the image to speech. It states:

Emergency information that is provided visually during programming that is neither a regularly scheduled newscast, nor a newscast that interrupts regular programming . . . must be made accessible to individuals who are blind or visually impaired through the use of a secondary audio stream to provide the emergency information aurally. . . The video programming distributor or video programming provider that creates the visual image is responsible for providing an aural representation of the information. . . .²²

The rule also mentions text-to-speech as a method for providing the information in an image aurally, further implying a possible obligation to directly describe an image aurally,²³

Without a permanent change (or at the very least, a continued waiver), this uncertainty will cause many stations to stop showing such images if the audible crawl rule takes effect,²⁴ rather than risk FCC enforcement penalties for not providing an exact aural

²⁰ CMG Reply Comments at 4-5.

²¹ See, e.g., Emergency Information Order, 28 FCC Rcd at 4892-02; 2023 Waiver Order, 38 FCC Rcd at 4986.

²² 47 C.F.R. § 79.2(b)(2)(ii).

²³ *Id.*

²⁴ CMG Reply Comments at 4.

translation of the emergency information conveyed in an image.²⁵ The end result will mean less information about emergencies for all viewers, including deaf and hard of hearing viewers who may find such graphics particularly helpful.

NAB therefore requests a change to the text of the audible crawl rule to clarify and confirm that compliance is met when a station that displays a visual, non-textual image about an emergency during non-newscast programming provides textual crawls that provide emergency information equivalent or duplicative to the emergency information conveyed by the image. This fairly minor modification will provide broadcasters the regulatory certainty and clarity needed to continue showing such images if the rule takes effect.

IV. Best Practices Will Facilitate Compliance with a Revised Audible Crawl Rule

To facilitate compliance with NAB's proposal, we have created the attached draft best practices regarding the use of text crawls when a station chooses to display a visual image about an emergency during regular programming. We have shared this initial draft with ACB and AFB and look forward to incorporating their advice into the final product. The current draft reflects numerous conversations between broadcasters and consumer advocates as well as input from news directors and meteorologists at stations in areas prone to severe weather who have experience leading stations' use of graphic images, text crawls, live reporting, and other programming to inform viewers about emergencies.

The recommendations are two-fold. First, stations that choose to display a non-textual graphic about an emergency during regular programming should run text crawls that "accurately and effectively convey the critical details regarding the emergency and how to

²⁵ Comments of the Society of Broadcast Engineers, Inc. at 3, MB Docket 12-107 (Apr. 24, 2023).

respond to the emergency.”²⁶ Although the emergency information provided in text crawls may not be an exact transcription of the information conveyed by the graphic image, the information should be at least equivalent or duplicative of the information conveyed by the image.

Second, a station should run such text crawls frequently enough to facilitate access to the emergency information in the crawls for individuals who are blind or low vision. The document notes that stations may cover weather emergencies differently depending on the certainty and severity of an event, as well as their viewers’ familiarity with the kind of event at hand. For example, a station in Austin would be more likely to overlay a radar map during regular programming and run frequent crawls about a potential snowstorm than a station in Syracuse. However, for simplicity and consistency, the best practices recommend that any station choosing to display a visual image about an emergency should run text crawls at least every 10 to 15 minutes while the image is shown on screen, and more often if the situation warrants.

NAB believes this approach strikes a reasonable balance. The recommendations will not only establish a floor for the content and frequency of textual crawls for stations that already display a visual image about emergencies, but will encourage stations that do not typically display such images to do so because they will have clearer guidance for complying with the audible crawl rule. The best practices will also increase the confidence of broadcasters that already run text crawls more often than recommended that they can maintain their current practice without running afoul of the rule.

²⁶ 2023 Waiver Order, 38 FCC Rcd at 4983.

More importantly, the recommendations should help ensure that blind and low vision viewers can access the critical information about an emergency conveyed in a visual image. NAB will take steps to educate stations about the importance of providing accessible information about emergencies and urge stations to implement these recommendations into their emergency news coverage. We are eager to coordinate with AFB and ACB on these efforts.

V. A Brief Extension of the Existing Waiver of the Audible Crawl Rule While the FCC Considers NAB's Request Would Serve the Public Interest

Pursuant to 47 C.F.R. §§ 1.3 and 14.5, NAB requests an extension of the existing waiver of the audible crawl rule. The Commission may waive its rules for good cause,²⁷ which can be demonstrated by special circumstances that justify a deviation from a specific rule,²⁸ such as where compliance would be unduly burdensome.²⁹ In this case, there remains no viable technical solution that would enable broadcasters to comply with the audible crawl rule. In addition, as the FCC has previously noted, granting a waiver will not reduce access to emergency information because the critical details of an emergency provided in a visual image are in most cases duplicative of information conveyed in textual crawls, which are audibly accessible.

²⁷ 47 C.F.R. § 1.3.

²⁸ *Northeast Cellular Telephone Co. v. FCC*, 897 F.2d 1164, 1166 (D.C. Cir. 1990).

²⁹ *WAIT Radio v. FCC*, 418 F.2d 1153, 1157 (D.C. Cir. 1969).

VI. Conclusion

Accordingly, NAB respectfully requests the modification of 47 C.F.R. § 79.2(b)(2)(ii) set forth above, and a brief 18-month extension of the existing waiver of this rule while the Commission considers this request.

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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**ENSURING THE ACCESSIBILITY OF EMERGENCY
INFORMATION CONVEYED BY VISUAL IMAGES
BEST PRACTICES FOR TELEVISION STATIONS**

The National Association of Broadcasters

Created November 15, 2024

Introduction

The Federal Communications Commission (“FCC”) requires that television stations make “emergency information” provided during regular, non-newscast programming accessible to persons who are blind or low vision.¹ Broadcasters typically comply in one of two ways. Before a weather event or other situation becomes extremely serious and imminent, stations often keep viewers informed through text crawls that usually run across the bottom of the screen, which are convertible to aural speech. As an event approaches and becomes more certain, stations often break into programming with a voiced update by a meteorologist or reporter.

In some cases, stations may also overlay a small visual image in a corner of the screen during regular programming, like a dynamic weather radar map. The FCC requires broadcasters to ensure that the “emergency information” conveyed by such visual images are accessible to persons who are blind or low vision, also known as the “audible crawl rule.” 47 C.F.R. § 79.2(b)(2)(ii). The vast majority of such images concern weather events.

Unlike text crawls, no technology exists yet that can convert the emergency information conveyed by these moving visual images into aurally accessible speech. Thus, blind and low vision viewers cannot perceive the emergency information conveyed in such images. Fortunately, broadcasters rarely display such images during non-newscast programming alone, as nearly all such images are accompanied by close-in-time text crawls until a station breaks in with live reporting. One possible exception is when stations display a branded image like a weather “bug” to encourage viewers to stay tuned to the station should an emergency develop; however, images shown under these circumstances need not be made aurally accessible.

TV stations may treat emergencies differently based on their location and audience’s familiarity with similar events in the market. Despite this diversity, NAB believes it may be helpful, both for stations and the public, for broadcasters to employ certain best practices across the industry to help ensure consistent access to emergency information. Inside, readers will find recommendations to help guide broadcasters’ use of textual crawls when choosing to show a visual image about an emergency during non-newscast programming.

¹ The FCC’s rules define “emergency information” 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.” The rules offer examples of the types of emergencies covered by the rule, including “tornadoes, hurricanes, floods, tidal waves, earthquakes, icing conditions, heavy snows, widespread fires, discharge of toxic gases, widespread power failures, industrial explosions, civil disorders, school closings and changes in school bus schedules resulting from such conditions, and warnings and watches of impending changes in weather.”

Background

The [National Weather Service](#) (“NWS”) issues Warnings, Watches, or Advisories about weather-related emergencies, depending on the severity, timing, and certainty of an event (e.g., blizzard warning, flood watch, heat advisory). NWS broadcasts these messages via NOAA Weather Radio (“NWR”), and may broadcast multiple messages for a specific event. TV stations monitor NWR and convert the audio messages into on-screen text crawls (that are convertible to speech).

Text crawls minimize interruptions of regular programming; however, frequent crawls can annoy viewers, especially viewers that preset their televisions to convert all crawls to speech. Thus, some stations choose to display a small image like a weather radar map in a corner of the screen as a less obtrusive signal about an imminent or current situation. Such images may be displayed for 15 to 30 seconds, several minutes, or even longer, and are usually provided to complement or reinforce the emergency information provided in textual crawls.

Accessibility problems can arise if such an image is displayed for a long time during regular programming without accompanying text crawls and before a TV station breaks into programming with live reporting. In these situations, broadcasters should provide text crawls frequently enough to help ensure that blind and low vision viewers can access emergency information about the event that is conveyed by an image.

NWS uses NWR to notify TV stations about the vast majority of situations covered by the audible crawl rule. NWS prioritizes emergencies based on the severity, timing, and certainty of an event, and requests that stations broadcast the information, but leaves to a station whether to run a crawl, display an image, or break into programming with live reporting. Some stations also receive weather information via feeds from private companies like Barron Weather, AccuWeather, and The Weather Company, which often also create the visual images shown by stations.

NWS issues a Warning for situations that pose a significant threat to public safety or property, i.e., events with a high probability of occurrence and certainty of location, and relatively short time of onset. For example, a Hurricane Warning is issued when sustained winds of 74 mph or higher are expected, and if possible, broadcast 36 hours before the onset of tropical storm force winds (39 to 73 mph). NWS issues a Watch when a situation meets the criteria for a warning, but either the onset time, probability, or location is uncertain. For example, a Tropical Storm Watch is issued when cyclone winds of 39 to 73 mph or higher pose a possible threat and may occur within 48 hours. NWS issues an Advisory for situations not serious enough to warrant a Warning, such as Winter Weather Advisory, which may be issued for freezing rain or when 2 to 4 inches of snow is expected to cause a significant inconvenience.²

NWR may broadcast multiple Warning messages for serious emergencies, and most stations nationwide run text crawls for nearly all such messages, are more likely to display a visual image

² NWS also broadcasts information for [non-weather hazards](#), such as earthquakes, chemical releases, and AMBER alerts, in which case broadcasters are far more likely to provide only crawls without any visual image.

like a radar map during regular programming. Lesser events that trigger only a Watch or Advisory may be treated differently. For example, a Winter Storm Watch is more likely to cause stations in Las Vegas to run frequent text crawls and display a radar map during regular programming than stations in Syracuse.

In some cases, stations may run text crawls or show a visual image for events outside their market because the area to be impacted is a large city in the same state, i.e., Baton Rouge stations may notify local viewers about a hurricane in New Orleans.

Finally, it is not uncommon for stations to show a branded promotional image during normal weather conditions or long before a possible weather event to remind viewers about their news and weather reporting.

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Best Practices

Visual Images and Text Crawls

Television stations must ensure that emergency information about a current emergency is accessible to persons who are blind or low vision. Therefore, if a station displays a small visual image during regular programming, like a weather radar map, to notify viewers about an emergency, it should run accompanying text crawls that can be converted to speech.

Content of Crawls

Textual crawls must convey emergency information that is at least equivalent or duplicative of the emergency information conveyed by the visual image. The text crawls need not be an exact aural translation of the visual image, but stations must make sure not to convey information in a visual image that is not provided in crawls.

Frequency of Text Crawls

Stations may treat events differently depending on the severity, timing, location, and certainty of the event (e.g., Warning, Watch, or Advisory). However, if a station chooses to visual image about an emergency during non-newscast programming, textual crawls that provide equivalent or duplicative emergency information should be broadcast at least every 10 to 15 minutes to help ensure that blind or low vision viewers can access the critical information about the situation. For example,

- **If an image is displayed for fewer than 10 minutes, an audibly accessible text crawl that provides at least equivalent or duplicative emergency information should be run at least once**
- **If an image is displayed for 10 to 30 minutes, crawls should be run at least two or three times**
- **If an image is displayed for 30 minutes or longer, crawls should be run at least three times and/or at least every 10 minutes**

If a station breaks into regular programming with a voiced news report about the emergency, stations may adjust the frequency of text crawls accordingly.

Additional Circumstances

- There is no obligation to provide aurally accessible textual crawls if a station chooses to display a visual image during non-newscast programming about an event that is not a current emergency, such as well before a storm is certain to develop or affect a station's market. Nevertheless, stations should still provide textual crawls as recommended above for purposes of consistency for viewers and simplicity of implementation for stations.
- Although there is no obligation to provide textual crawls if an image is displayed about an event outside a station's coverage area (e.g., in another city of interest to viewers), stations are encouraged to run crawls depending on the significance of the external event.

- Branded visual images that a station runs during normal weather conditions solely to promote its coverage of news and weather need not require an accompanying text crawl.
- Broadcasters are also encouraged to make sure there is sufficient color contrast in any visual images they choose to display to help individuals who have some measure of sight and may not need an aural representation of the image can clearly see what information is being conveyed by the image.