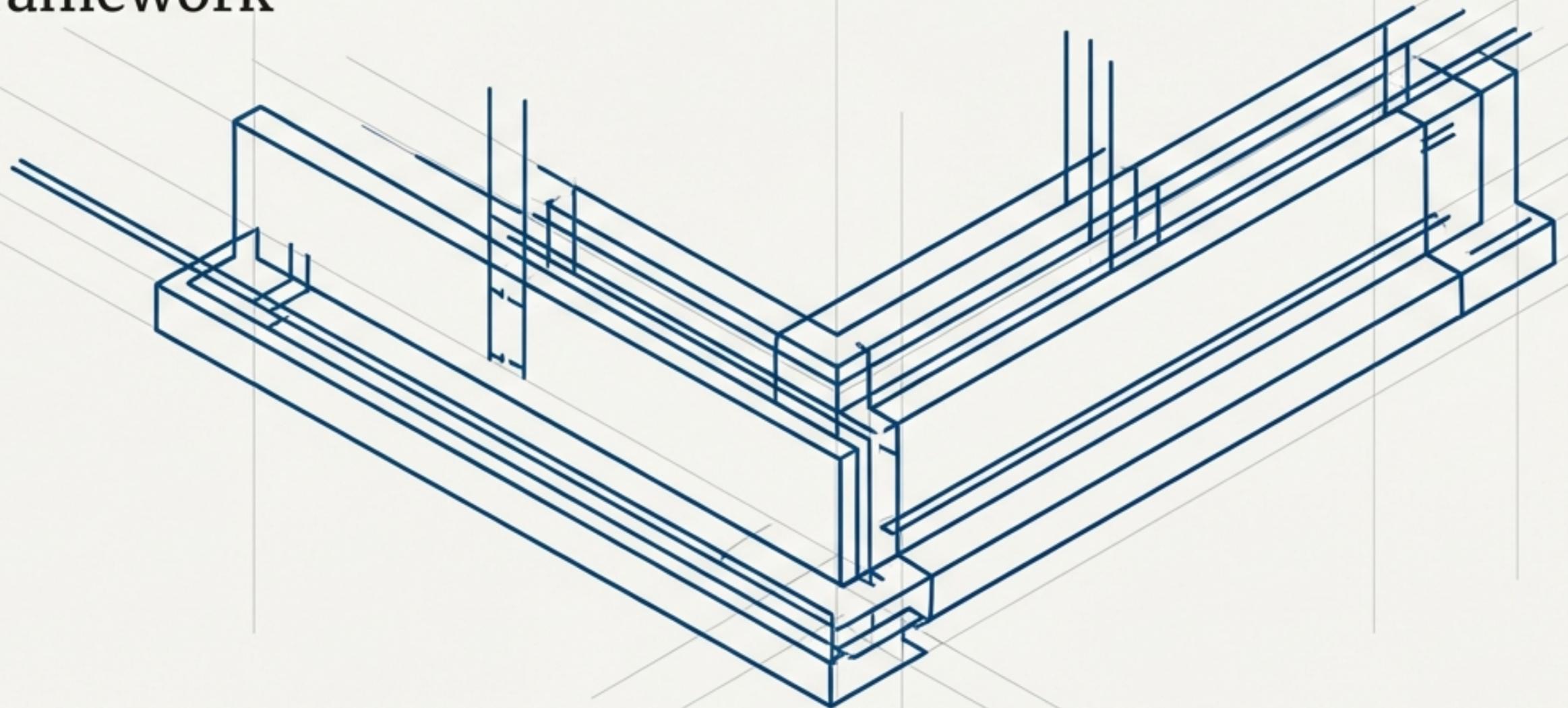


Building a Durable Foundation for Deaf Accessibility

A Proposal for DIG Sponsorship
of the 14¹⁰ Framework



Today's Accessibility Landscape is Built on an Unstable Foundation

We all know the current reality of accessibility for Advanced Communications Services (ACS). Compliance is a patchwork of inconsistent, unreliable, and often invisible efforts.



Ad Hoc & Opaque

Relies on one-time VPATs that quickly become outdated, and non-portable features siloed within specific platforms.



Inconsistent & Unauditable

Lacks a repeatable, auditable method for demonstrating compliance, leaving users and agencies at risk.

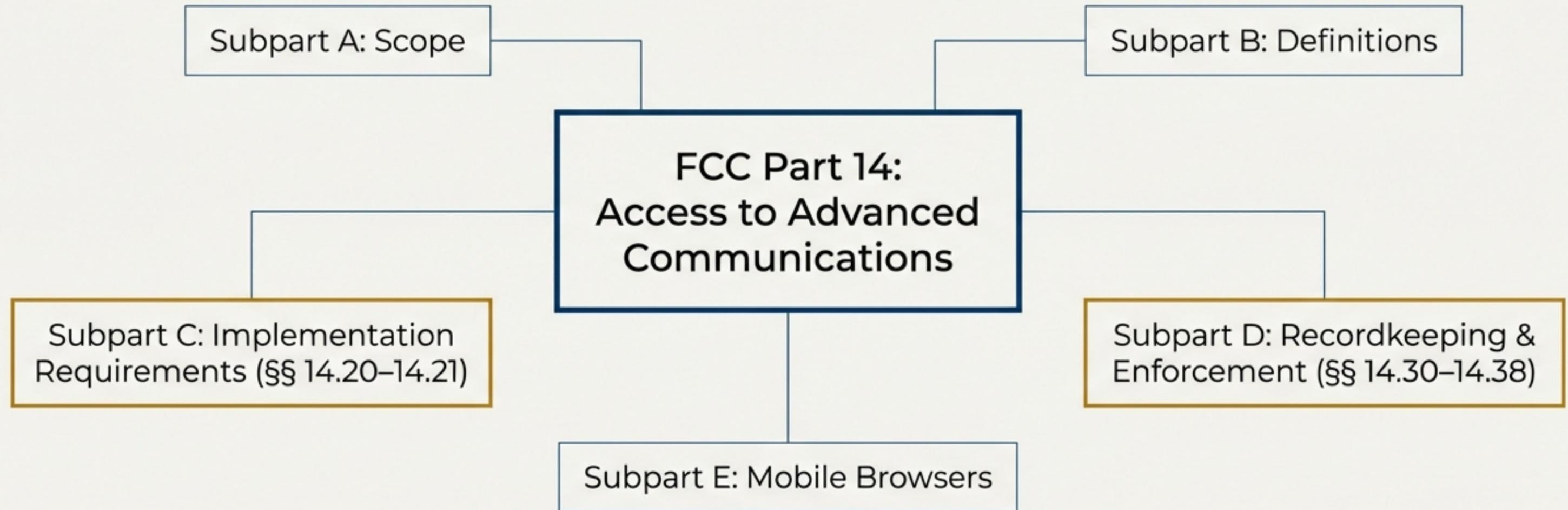


Unaccountable AI

Faces increasing reliance on AI-mediated communication without corresponding accountability structures for accessibility.

The Mandate for Accessibility Already Exists: 47 CFR Part 14

The rules for accessible Advanced Communications are clear. The challenge isn't the absence of law, but the absence of a framework to consistently implement and verify it.



The law provides the *what*, but industry lacks a consistent *how*.

Part 14 Demands More Than Features; It Demands Provable Outcomes

The regulation is built on three core pillars: services must be Accessible, Usable, and Compatible. Crucially, it also mandates that companies keep records to prove it.



1. Performance Objectives (§14.21)

Defines functional outcomes. This is not just about having a feature, but ensuring it provides genuine access.

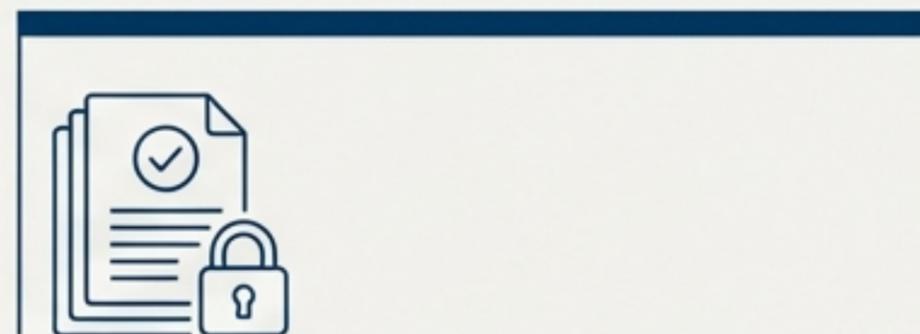
“Provide at least one mode that does not require user auditory perception.” (14.21.b.1.iv)



2. Usability & Compatibility (§14.21)

Ensures people with disabilities have access to the full functionality and can use their own assistive technology.

“Technical support access is functionally equivalent to that provided to individuals without disabilities.” (14.21.c.3)



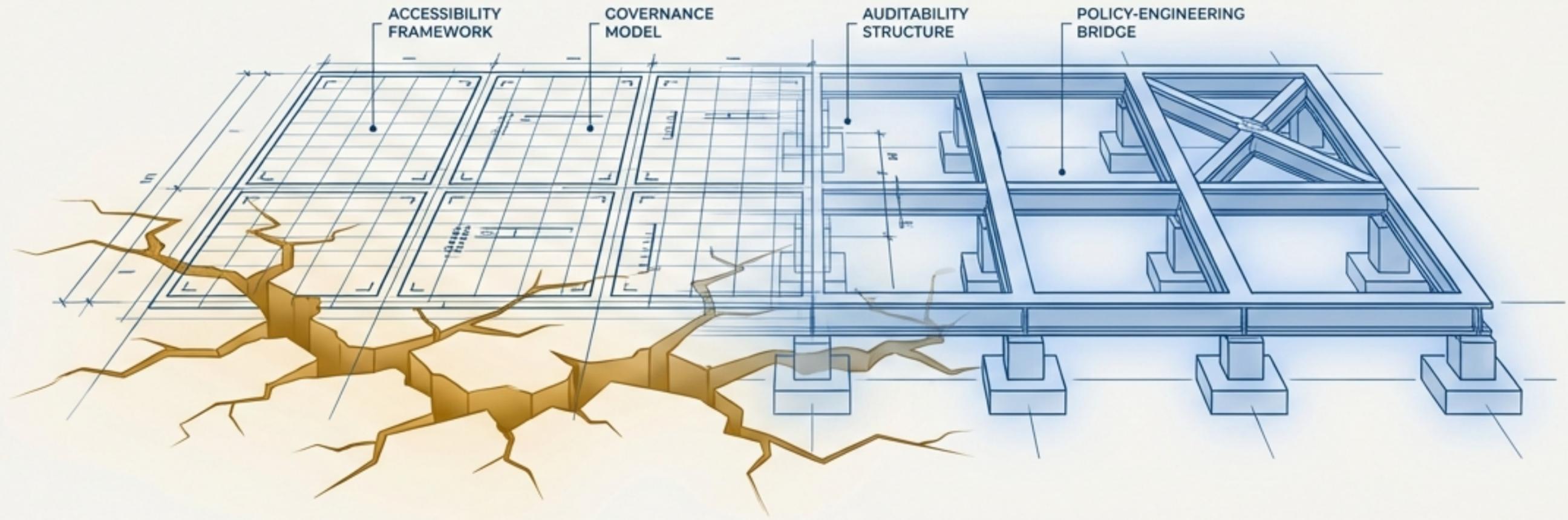
3. Defensible Records (§14.31)

Requires companies to keep records of their efforts to ensure accessibility and compatibility, forming the basis for compliance.

“Keep records of efforts (consultation, features, compatibility) for required period.” (14.31(a))

We Propose the Architecture to Bridge Policy and Practice: 14¹⁰

A structural framework that translates Deaf accessibility values into durable, technical form.



14¹⁰ IS

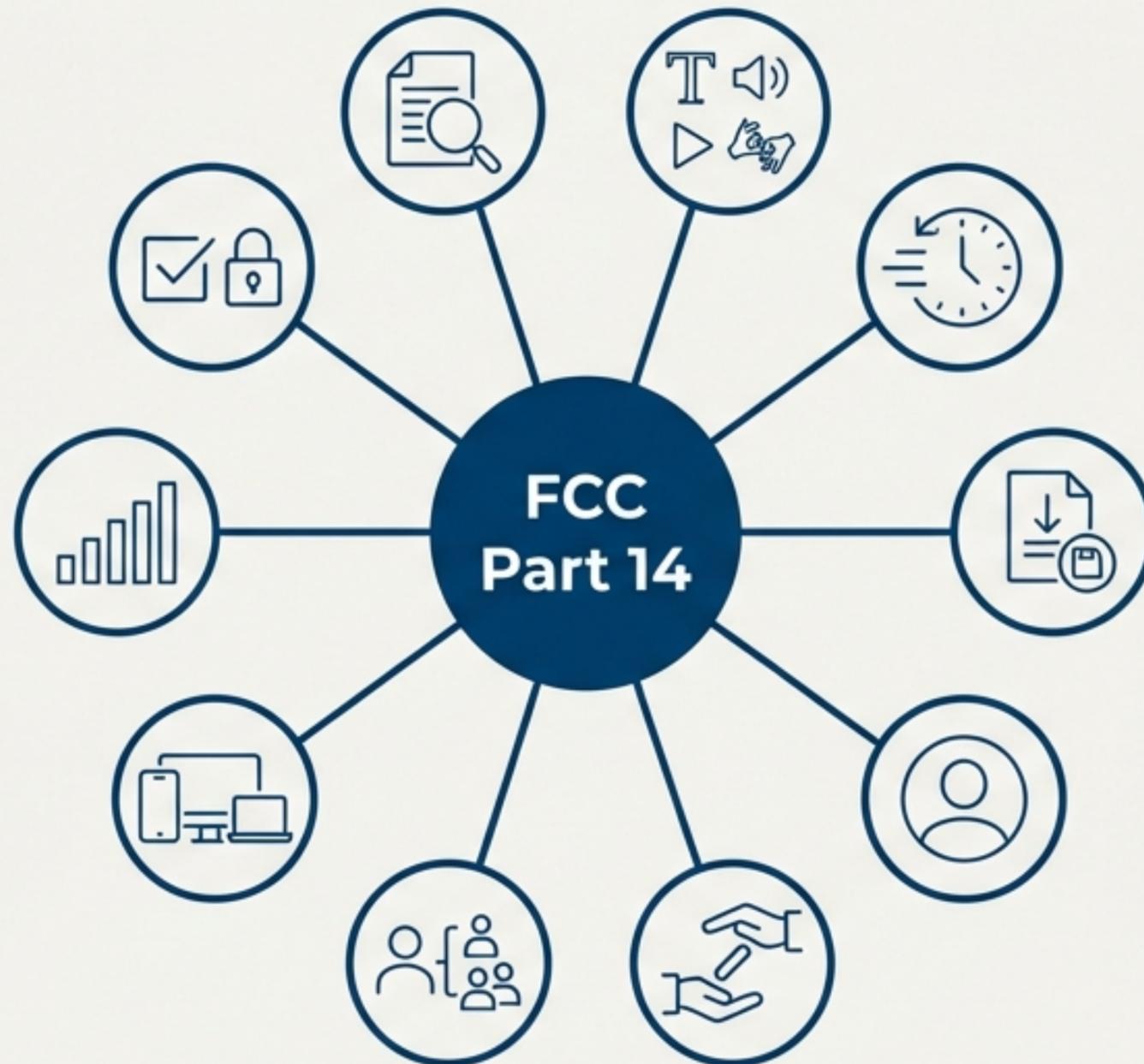
- A **framework** for interpreting and operationalizing FCC Part 14.
- A **governance model** for accessibility capabilities, consent, and delegation.
- A **recordkeeping and auditability structure**.
- A bridge between **policy, engineering, and lived experience**.

14¹⁰ IS NOT

- A relay service, TRS, or VRS platform.
- A single application or product.
- A commercial product or a revenue-generating mandate for DIG.
- An attempt to create new regulatory authority.

Why “Fourteen to the Tenth Power”?

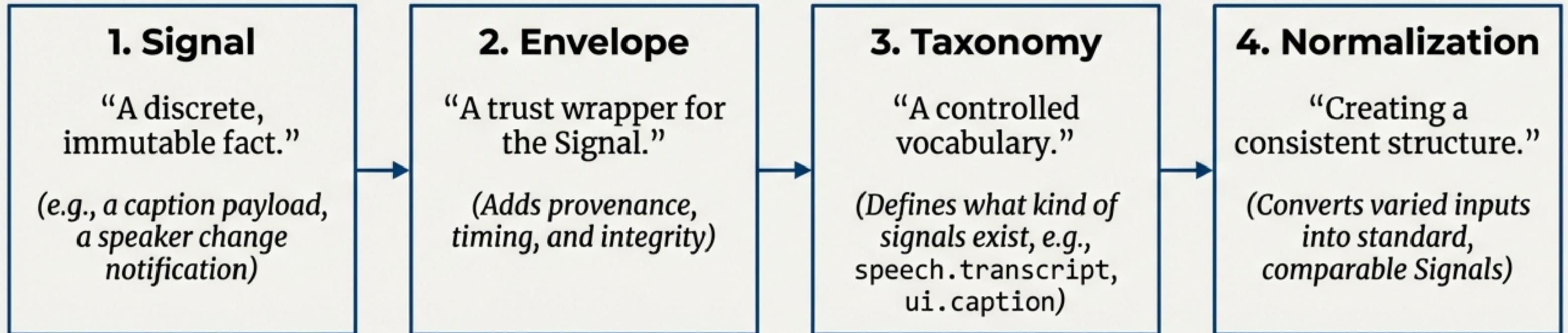
Part 14 obligations don't exist in a vacuum. They must apply simultaneously across the ten dimensions of modern communication. 14¹⁰ provides the structure to evaluate this reality.



1. Modality
2. Latency
3. Persistence
4. Identity
5. Delegation
6. Context
7. Device Class
8. Environment
9. Control & Consent
10. Auditability

The Framework is Built on a Common Language for Accessibility Events

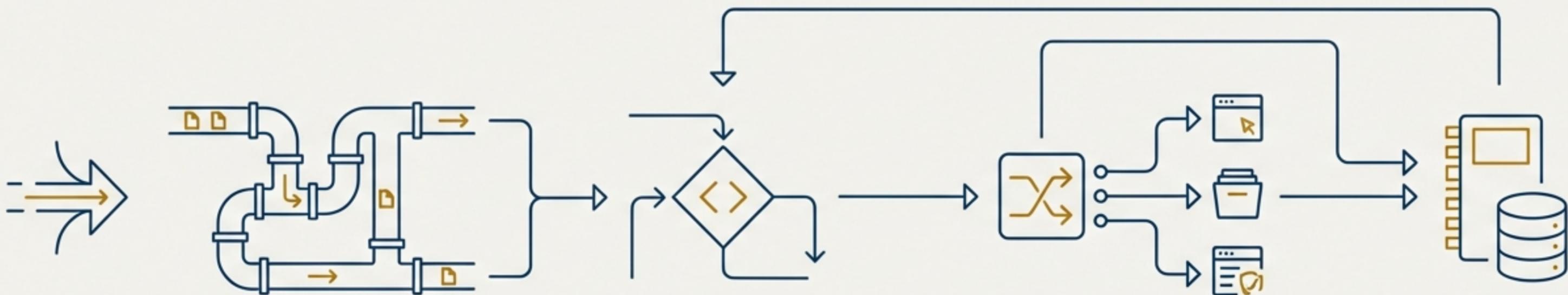
14¹⁰ works by creating discrete, immutable, and verifiable pieces of information. This transforms vague claims into concrete data.



Key Idea: We move from ‘someone said something’ to a verifiable record: [Envelope] containing a [Signal] of type [Taxonomy].

These Events Flow Through a System of Deterministic Logic and Routing

Once we have trusted Signals, we can build reliable systems that act on them according to clear, auditable rules.



5. Pipeline

An observable flow that ingests and transforms Signals.

6. Rule

A deterministic, “policy-as-code” statement.

(e.g., IF `speech.transcript` exists, THEN ensure `ui.caption` pipeline is active)

7. Routing

Declarative delivery of Signals to destinations (e.g., UI, archives, compliance systems).

8. State

Derived context computed from Signals over time (e.g., who is currently speaking).

The Result: Auditable Evidence and Assertions that Directly Address Part 14

The entire system is designed to produce two critical outputs that fulfill the recordkeeping obligations of §14.31.



Example Assertion:

```
{
  "regime": "FCC",
  "authority": "47 CFR Part 14",
  "control_id": "14.21.b.2.iv",
  "status": "pass",
  "evidence_refs": ["id-of-caption-log"]
}
```

14¹⁰ makes compliance a computable outcome, not an opinion.

A Practical Example: Ensuring Access in Interoperable Video Conferencing

Let's see how 14¹⁰ applies to the upcoming 2027 requirements for video conferencing services (IVCS).

FCC Requirement (§14.21)	User Experience Problem	14 ¹⁰ Solution
14.21.b.2.iv: Provide accurate, synchronous captions.	“Did the captions actually appear? Were they readable?”	Generates Evidence (caption logs, timing traces) to back an Assertion of compliance.
14.21.b.4.i: Enable third-party sign language interpretation.	“Could my interpreter connect and was the video quality sufficient?”	Generates Evidence (video_quality_for_signing_report) to prove the platform met technical standards.
14.21.b.4.ii: Provide UI controls for captions and signers.	“Can I pin my interpreter and resize the caption window?”	ui.a11y_state Signals confirm the controls were present and functioned.

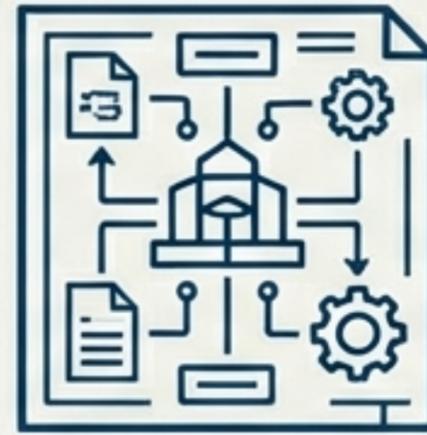
DIG is Uniquely Positioned to Champion this Framework

Sponsoring 14¹⁰ aligns perfectly with DIG's mission and leverages its unique credibility. No other organization sits at this intersection.



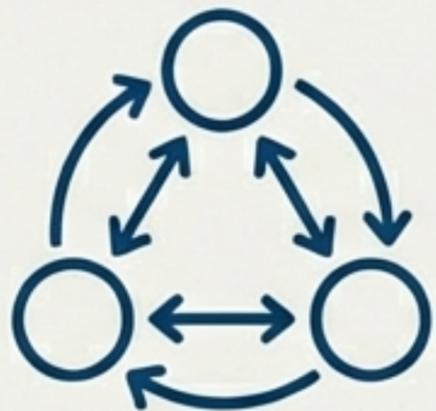
Represents the User

Embodies the Deaf professional experience within government, the primary user and procurement entity.



Understands the System

Deeply familiar with federal procurement, compliance, and enforcement realities.



Has Convening Power

Holds established, trusted relationships with the FCC, federal agencies, and advisory bodies.



Maintains Neutrality

Can lead a standards-based conversation without any commercial conflict of interest.

Sponsorship Reinforces DIG's Role as a Standards-Setting Leader

By adopting 14¹⁰, DIG moves from being a powerful advocacy voice to becoming the **architect** of the technical standards for Deaf accessibility.

- ✓ Provides industry with a **clear, Deaf-centered interpretive framework** for Part 14.
- ✓ Strengthens enforcement through **clarity and auditable data**, reducing reliance on litigation.
- ✓ Proactively **shapes the intersection of AI and accessibility** before harmful norms become entrenched.
- ✓ Establishes a durable, technical foundation for **future advocacy and policy work**.

Requested Board Action

We are seeking Board approval to formalize DIG's role as the sponsor and steward of the 14¹⁰ framework. This involves four specific authorizations:

- 1. Recognize 14¹⁰** as a DIG-sponsored accessibility framework aligned with FCC Part 14.
- 2. Authorize the development of non-binding reference materials** (white papers, mappings, guides).
- 3. Authorize engagement with stakeholders** (FCC, agencies, industry) under **DIG's official auspices**.
- 4. Establish a lightweight governance group** within DIG to oversee the framework's integrity and evolution.

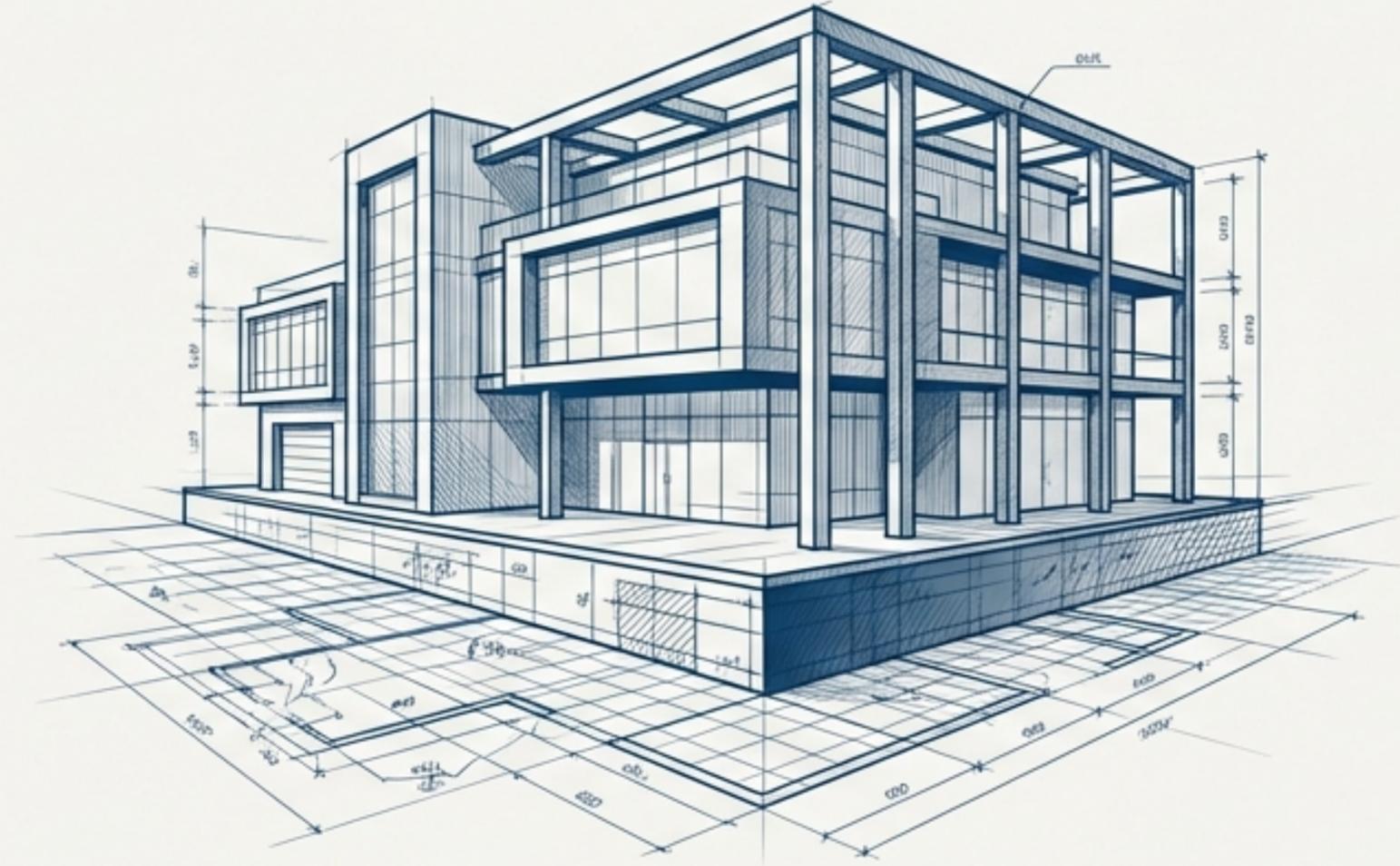
Clear Guardrails Protect DIG's Mission and Resources

To be clear, this approval does not create new financial or legal burdens for the organization.

What Approval Does NOT Do

- ⊘ Does **not** obligate DIG to build, buy, or fund any software.
- ⊘ Does **not** endorse or certify any specific vendor, product, or platform.
- ⊘ Does **not** create any new regulatory authority for DIG.
- ⊘ Does **not** expose DIG to any TRS/VRS compliance risk or liability.

The Choice Before Us: From Afterthought to Architecture



14^{10} gives DIG something it has not had before: a way to turn **Deaf accessibility values** into **durable technical structure**.

This is not about moving fast. It is about getting the foundation right—once—so that our access is never again an afterthought.