# UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

AMERICAN COUNCIL OF THE BLIND, et al.,

Plaintiffs,

v.

Case No. 1:02-cv-00864-BAH

STEVEN T. MNUCHIN, Secretary of the Treasury,

Defendant.

## **DEFENDANT'S TWENTY-SECOND STATUS REPORT**

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Defendant, by his undersigned counsel, hereby submits this Twenty-Second Status Report pursuant to paragraph 4 of the Court's Order and Judgment of October 3, 2008 (Doc. 96), and the Court's Order of August 15, 2012 (Doc. 121), which require the defendant to file semiannual status reports describing the steps taken to implement the Order and Judgment.

1. The Bureau of Engraving and Printing ("BEP" or "Bureau") continues to make progress in providing meaningful access to United States currency, including by exploring the options contained in the three-pronged approach of (1) adding a raised tactile feature ("RTF") to each Federal Reserve note that the BEP may lawfully redesign, (2) distributing electronic currency readers for blind and other visually impaired U.S. citizens and legal residents, and (3) continuing the Bureau's program of adding large, high-contrast numerals and different colors to each denomination that it may lawfully redesign.

2. BEP continues to pursue the creation of a durable, usable, and manufacturable tactile Feature that can function in commercial and governmental counting and inspection machines, as well as in ATMs and vending machines. The Bureau's efforts in that regard since the filing of Defendant's Twentieth Status Report on September 17, 2018 (Dkt. No. 166) are described in Defendant's Supplemental Status Report, dated December 20, 2018, and its attachment (Dkt. No.

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169), and in Defendant's Response to Order of January 9, 2019, dated February 8, 2019, and its attachments (Dkt. No. 179). Those filings are incorporated herein by reference.

3. Since the filing of the Defendant's Twenty-First Status Report, dated March 25, 2019 (Dkt. No. 184), BEP began manufacturability testing of test notes using two RTF application methods, Intaglio and Coated Embossing, in June 2019. The objective of a manufacturability testing is to determine the viability of incorporating a technology into a banknote using BEP equipment in production size quantities. During manufacturability testing, BEP is producing 400,000 sheets of test notes to evaluate the printed RTF created by using Intaglio and Coated Embossing application methods. BEP is printing 200,000 sheets for each application method. This manufacturability testing includes production on a newly acquired Multifarious Press, which is used for the Coated Embossing application method.

4. The production of the test notes is a complicated process that requires use of various machines, including Offset, Plate Printing, Multifarious Press (Coated and Embossed only), and Large Examining & Printing Equipment (LEPE) machinery. After the test notes are printed, they are then processed on two additional machines, the Currency Inspection System (CIS), and Single Note Inspection (SNI).

5. Previously, BEP anticipated completing the manufacturing testing by September 2019, and selecting the RTF application method by December 2019. *See, e.g.*, Defendant's Response to Order of January 9, 2019, Dkt. No.179. Due to equipment unavailability, repairs, and currency production requirements, manufacturability testing may not be completed until March 2020. After testing is completed, and assuming that an effective, manufacturable RTF application method is identified, BEP will make a selection recommendation for the RTF application method to the Interagency Currency Committee (ICC) and to the Advanced Counterfeit Deterrence (ACD) Steering Committee. If the selection recommendation is

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approved by the committees, the ACD Committee will recommend an application method to the Secretary of the Treasury, who will select the RTF application method. BEP and the Department of Treasury continue to expect to have the first denomination of the redesigned banknotes ready for production no later than 2026. Defendant's Twentieth Status Report (Dkt. No. 166).

6. BEP continues to provide meaningful access to the currency for a large proportion of blind persons through a currency reader distribution program operated in conjunction with the National Library Service of the Library of Congress. As of September 12, 2019, the program has distributed approximately 74,019 readers. BEP has signed a total of 12 Memoranda of Agreement with various entities to assist in distributing currency readers to our constituents. In fiscal year 2019, BEP entered into nine such agreements, one each with the following entities: BlindSight Delaware, Helen Keller Services for the Blind, Southern California Permanente Medical Group (Kaiser), Maryland Department of Disabilities, Richin Eye Associates, The Carroll Center, Visions, VA-Palo Alto Health Care System, and Assistive Technology Act Program (ATAP) for Minnesota STAR Program.

7. BEP also continues to provide meaningful access for a large segment of the blind community through mobile device applications, which allow smartphones and similar devices to function as currency readers. The number of downloads of these applications continues to increase. The EyeNote app for Apple devices, which BEP developed, has been downloaded approximately 67,231 times. The IDEAL Currency Identifier app for the Android operating system has been downloaded approximately 26,709 times. The Agency has also handled 13,231 customer-service calls.

8. BEP continues to conduct extensive public outreach in connection with its meaningful access program, primarily to promote the currency readers. In fiscal year 2019,

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BEP participated in the following 12 conferences: National Industries of the Blind, two National Federation of the Blind State Chapter Conventions, Springfield Health and Wellness Festival, Focus on Vision Impairment & Blindness Conference, California State University Northridge (CSUN) Assistive Technology Disability Conference, National Federation of the Blind Annual Convention, American Council of the Blind Annual Convention, Association for the Educators and Rehabilitation Vendor Fair, Aging in America Conference, Blind Veterans Association National Convention and American Foundation for the Blind Leadership Conference. These conferences had a combined attendance of around 20,000 people.

DATED: September 16, 2019

JOSEPH H. HUNT Assistant Attorney General

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