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, ¹)))
Defendant.))

DEFENDANT'S SEVENTEENTH STATUS REPORT

Defendant, by his undersigned counsel, hereby submits this Seventeenth 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 semi-annual 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 exploring the options contained in a three-pronged approach to providing meaningful access to United States currency by (1) adding a raised tactile feature 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

¹ Steven T. Mnuchin is substituted for Jacob J. Lew as the defendant in this action pursuant to Rule 25(d) of the Federal Rules of Civil Procedure.

² This Court denied a motion by the plaintiffs to modify the Court's Judgment in this action (Doc. 152), and the plaintiffs have appealed that denial to the Court of Appeals, Case No. 17-5013 (D.C. Cir.).

- 2. In its continuing development of an appropriate tactile feature for the currency, BEP is preparing to test a variety of tactile feature configurations using outside focus groups. The test notes to be used will present six different locations and styles of tactile features, in five denominating patterns, for each of the two remaining potential application methods (Intaglio and Coated-Embossed). The Bureau is working with several private and government organizations to recruit a total of approximately fifty-five focus group participants for this testing. These tests are part of the Bureau's attempts to rectify the accuracy and durability concerns that have so far been associated with tactile features. *See* Opp. to Pls.' Mot. to Modify J. (Doc. 148) at 26-28.
- 3. 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. As of March 14, 2017, the program has distributed more than 49,190 readers.
- 4. BEP continues to promote the currency reader program by reaching out to news organizations, advocacy groups, and government agencies. For example, the Bureau issued a nationwide press release regarding the currency reader program for Low Vision Awareness Month in February 2017. The iBill Currency Reader device is currently on display at the National Museum of American History in an exhibition entitled "The Value of Money," which explores new monetary technologies, among other things.
- 5. 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 31,582 times. The IDEAL Currency Identifier app for the Android operating

system has been downloaded approximately 10,338 times.

6. In addition to the above-described activities, BEP has participated in several privately sponsored and government-sponsored conferences or other events since the beginning of Fiscal Year 2017 to promote all aspects of the "Meaningful Access Program," including events held by the National Industries of the Blind, the American Foundation for the Blind, the Assistive Technology Industry Association, and three state chapters of the National Federation of the Blind. Also since the beginning of the current Fiscal Year, the BEP Director has been interviewed regarding the Meaningful Access Program on two additional radio and podcast programs that address the interests of blind and other visually impaired persons.

Dated: March 16, 2017

Respectfully submitted,

CHAD A. READLER
Acting Assistant Attorney General

CHANNING D. PHILLIPS United States Attorney

JOSHUA E. GARDNER, D.C. Bar 478049 Assistant Director

/s/ W. Scott Simpson

W. SCOTT SIMPSON, Va. Bar 27487 Senior Trial Counsel

Attorneys, Department of Justice Civil Division, Room 7210 Federal Programs Branch Post Office Box 883 Washington, D.C. 20044 Telephone: (202) 514-3495

Facsimile: (202) 616-8470 E-mail: scott.simpson@usdoj.gov COUNSEL FOR DEFENDANT