

**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 STATUS REPORT**

Defendant, by his undersigned counsel, hereby submits this 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 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 are described in previous status reports 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. As reported in March 2020, BEP completed the production steps (i.e., the printing of the test sheets) of a 400,000 sheet Manufacturability Test to evaluate printed RTFs, created using Intaglio and Coated Embossing application methods. The objective of a Manufacturability Test is to determine the viability of incorporating a technology into a banknote using BEP equipment in production size quantities. Since the March 2020 status report, the data collected from inspection machines has been analyzed.

4. BEP is currently developing a method for collecting height measurements of the RTF. The delivery and installation of a new instrument for collecting these height measurements was delayed due to COVID-19. The instrument was accepted on 6/30/2020 and training was conducted on 7/1/2020.

5. BEP, along with government partners, will use the information gathered thus far to make a recommendation for the RTF application method to the Interagency Currency Committee (ICC), and, it is expected, the Advanced Counterfeit Deterrence (ACD) Steering Committee. If the selection recommendation is 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 anticipates that the Secretary will select an application method in the first quarter of fiscal year 2021 (i.e., before January 1, 2021). 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 many blind persons through a currency reader distribution program operated in conjunction with the National Library Service of the Library of Congress. As of September 11, 2020, the program has distributed approximately 79,219 readers. BEP has signed a total of 21 Memoranda of Agreement with various entities to assist in distributing currency readers to their constituents. Since the last status

report, BEP has signed six such agreements, one each with the Deaf Centers of Nevada, The Iris Network, VA- Central Texas Health Care System, VA- Puget Sound Health Care System, the Lee County Senior Center, and the TX Workforce Commission. BEP currently has agreements with five of the 13 Blind Rehabilitation Centers to distribute reader on behalf of BEP and is continuing to pursue the remaining centers for agreements.

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 75,305 times. The IDEAL Currency Identifier app for the Android operating system has been downloaded approximately 35,411 times. The Agency has also handled 14,026 customer-service calls.

8. BEP continues to conduct extensive public outreach in connection with its meaningful access program, primarily to promote the currency readers. BEP has participated in nine conferences in FY 2020. Since the last status report, BEP participated in two virtual conferences: the 2020 National Federation of the Blind National Convention, and the American Council of the Blind 59th Annual Conference and Convention. These nine conferences had 31,000 attendees (combined). BEP was scheduled to participate in four (4) additional conference that were cancelled due to the coronavirus pandemic: the National Federation of the Blind Washington Seminar Career Fair, the California State University Northridge Assistive Technology Disability Conference, the American Foundation for the Blind Leadership Conference, and the Focus on Vision Impairment & Blindness Conference.

DATED: September 15, 2020

Respectfully submitted,

JEFFREY BOSSERT CLARK  
Acting Assistant Attorney General

CARLOTTA P. WELLS  
Assistant Director

*s/ Justin M. Sandberg*  
JUSTIN M. SANDBERG (Ill. Bar. No.  
6278377)  
Senior Trial Counsel  
U.S. Department of Justice, Civil Division  
Federal Programs Branch  
1100 L Street NW, Room 11004  
Washington, DC 20005  
Tel.: (202) 514-5838  
Fax: (202) 616-8460  
Email: justin.sandberg@usdoj.gov  
*Counsel for Defendant*