

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

AMERICAN COUNCIL OF THE BLIND, et al.,)
)
Plaintiffs,)
)
v.)
)
JACOB J. LEW, Secretary of the Treasury,¹)
)
Defendant.)
_____)

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

DEFENDANT’S NINTH STATUS REPORT

Defendant, by his undersigned counsel, hereby submits this Ninth 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”) is making progress toward implementing the Secretary of the Treasury’s decision to provide 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) continuing the Bureau’s program of adding large, high-contrast numerals and different colors to each denomination that it may lawfully redesign, and (3) implementing a supplemental currency reader distribution program for blind and other visually impaired U.S. citizens and legal residents.

2. The BEP continues to evaluate various potential tactile feature application methods by conducting manufacturing/processing trials and usability tests on samples that have been produced to date. The Bureau has produced samples of tactile features using three different application technologies: screen printing, intaglio printing, and coating. The BEP evaluated but then

¹ Pursuant to Federal Rule of Civil Procedure 25(d), Jacob J. Lew is substituted for Timothy F. Geithner as the defendant in this action.

eliminated a fourth potential application technology – ink jet printing – from further investigation due to the estimated high cost and projected lengthy time period for the development of that technology to meet the demands of BEP’s projected banknote production requirements. The BEP has also completed initial testing of one type of screen-printed samples using its existing processing machinery, which indicated certain areas that may need modification to accommodate banknotes with a raised tactile feature. The Bureau is continuing this research toward choosing a tactile feature application method.

3. In relation to usability testing, BEP attended the “28th Annual International Technology and Persons with Disabilities Conference” conducted by the Center on Disabilities of California State University, Northridge, in February 2013. The Bureau attended this conference to collect data and feedback from blind attendees regarding the relative perceptibility of samples of various tactile features. This was accomplished using an acuity test protocol developed for this purpose by a BEP contractor and approved by the U.S. Office of Management and Budget. BEP is currently preparing to conduct similar activities at the annual conventions of the National Federation of the Blind and the American Council of the Blind in July 2013.

4. The Eighth Status Report indicated that the BEP had presented its recommendations regarding the order of the next currency redesign to the Interagency Currency Design Technical Group (“ICD”), and that the ICD had requested additional clarification and information. The Bureau has responded to that request. Subsequently, the ICD has crafted a plan for the currency design order, which has been endorsed by the Advanced Counterfeit Deterrence Steering Committee (“ACD”). The decision regarding the order of redesign will ultimately be made by the Secretary of the Treasury.

5. Meanwhile, the Bureau is also making plans to work with cash handling equipment manufacturers to minimize any impact that the addition of a tactile feature to the currency may have on banking and cash handling and processing operations. The Bureau plans to meet with such manufacturers within the next six months to let them inspect a variety of raised tactile feature designs and materials that the BEP is considering. This will allow the manufacturers to start preparing for the incorporation of a tactile feature.

6. The BEP continues to explore the most promising options for implementing the currency reader program. The Bureau and the National Library Service of the Library of Congress (“NLS”) are engaged in exploratory discussions regarding the possibility of an interagency agreement under which the NLS would assist the BEP – which would be solely responsible for funding – with the distribution of currency readers and other administrative aspects of the program. Also, BEP’s Office of Acquisitions is preparing a solicitation to procure the currency readers for the program.

7. Further, as indicated in the Eighth Status Report, the BEP issued a Request for Information (“RFI”) to obtain feedback from potential contractors to provide certain support services for the currency reader program. Specifically, the RFI was issued to identify entities that could provide educational and communications services as part of the outreach effort for the program. The Bureau received six responses to the RFI, which will be used to develop a statement of work as part of a formal solicitation for such support services.

8. Finally, as stated in earlier status reports, the BEP has developed “EyeNote,” a free application for the Apple mobile operating system that allows users to scan a bank note and hear the note’s value (<http://www.eyenote.gov/>). Since the release of EyeNote in April 2011, it has been downloaded approximately 10,500 times. Additionally, the Eighth Status Report indicated

that BEP had worked with the Department of Education toward the development of a comparable application for the Android platform. The Android application – the “IDEAL Currency Identifier” – was released to the public in October 2012, and has been downloaded nearly 500 times (<https://play.google.com/store/apps/details?id=org.ideal.currencyid&hl=en>).

Dated: March 18, 2013

Respectfully submitted,

STUART F. DELERY
Acting Assistant Attorney General

RONALD C. MACHEN JR.
United States Attorney

RACHEL J. HINES, D.C. Bar 424774
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