

**Declaration of Joanna Foster**

Re: Princeton University/Kindle DX

I, Joanna Foster, declare as follows:

1. The facts in this declaration are based upon my personal knowledge. If called to testify, I could testify competently to the facts described in this declaration.
2. My name is Joanna Foster.
3. I live in Ellison Bay, Wisconsin.
4. I am graduated from Princeton University in May 2008 with a major in ecology and evolutionary biology.
5. I intend to pursue a career in journalism with a focus on science, health and environmental reporting. In the fall of 2009, I will begin a Master's degree through the Science, Health and Environmental Reporting Program (SHERP) at New York University.
6. I am legally blind as a result of Stargardt's Disease. While I have some residual vision, I have little central vision and no depth perception. I cannot read standard print. To read, I require books in recorded audio or as electronic text that I can read using automated text-to-speech software on my computer or in an enlarged font.
7. I began my freshman year at Princeton in the fall of 2004. Before the first semester started, I met with Princeton's Office of Disability Services (ODS) office to explain my disability and the accommodations I would need, including all books in audio or electronic format and a copy of the print book so that I could enlarge diagrams.
8. The dean of the ODS told me that I should wait until the first day of class to receive the syllabi from my professors for each class and provide the syllabi and textbook lists to the ODS. Once received, the ODS would attempt to locate the book in an audio format through Recording for the Blind and Dyslexic (RFB&D). If the book was unavailable through RFB&D, as most books were, ODS would hire a reader to read the text of the books aloud and record the readings on cassette tapes. I would receive an e-

mail from ODS when the cassette tapes were ready. ODS was reluctant to begin the process of locating or obtaining accessible copies of my books before classes began because, they said, professors often change their minds about which books they will assign before the start of class.

9. Throughout my freshman year, the cassette recordings of my books arrived weeks after my courses started and reading assignments were due. As a result, I simply could not complete my reading assignments. Where I could, I would ask friends to read the material to me. Without my books, however, I felt I was falling far behind in a competitive environment and course loads that required a significant volume of reading. I felt I was at a complete disadvantage in a very competitive environment. About halfway through my first semester, I realized I could not keep up without better accommodations.

10. I went to the ODS office, often in tears, because I did not have my reading material and was falling behind. During my second semester freshman year, I was enrolled in Introduction to Molecular Biology, a required class for my major. I had not received the cassette tapes of my textbook well into the semester, and was forced to take the midterm exam without ever having had the textbook. I complained to the ODS office that this was unacceptable.

11. My junior year, a new Dean of the ODS office at Princeton was appointed, and process improved somewhat, though I still received books much later than my sighted peers. Under the new system, I would drop off my syllabi, as before. Princeton's ODS would then send the print textbooks to another university to be scanned and converted into electronic text, then returned to me on a CD that I could read using screen-access software on my computer. Although this system moved much faster, I still received my books two weeks into the semester.

12. While the scanned books were an improvement over the audio, in that I could enlarge the screen and search for words or phrases, they lacked navigation structure and

reading order. For example, if the scanned page had two columns of text, the screen access software would read across the two lines of the columns, making it difficult to read and understand.

13. Also, sometimes the quality of the scanned material was poor and contained conversion errors. I would often skip reading where the scanned quality was poor and contained conversion or navigation errors. Sometimes, I could find someone to read the text aloud to me. Other times, I would enlarge the text to a size that I could read. However, often, even if enlarged, the text was too grainy and faded for me to read. I can only sustain reading enlarged print for a short period of time, after which my eyes become fatigued, and I need text-to-speech or audio. It is also much slower for me to read enlarged print rather than through a text-to-speech or audio format. Nonetheless, because the scanned quality was often poor, I spent many additional hours slowly reading with my eyes.

14. Overall, as a blind student at Princeton, I felt I was at a significant disadvantage to my sighted peers because I did not have equal access to books. Sometimes, I would select my courses based on the availability of accessible textbooks, rather than my own interests, taking, for example, an English class on classics where I knew the books would likely be available through RFB&D, rather than a course with new textbooks or obscure reading materials.

15. The opportunity to have instant, portable access to my textbooks and course materials that I could read through text-to-speech would have revolutionized my undergraduate experience at Princeton. It would mean that as a blind student, one could have equal access to the books and materials as sighted classmates, closing the competitive gap I struggled with throughout my four years. This kind of equal access to books and materials is something that Princeton's ODS office simply cannot offer.

I declare under penalty of perjury under the laws of the United States of America  
that the foregoing is true and correct.

Executed this day of June 23, 2009, at Ellison Bay,  
Wisconsin,

A handwritten signature in cursive script, appearing to read "Joanna Foster", written over a horizontal line.

JOANNA FOSTER