

October 1, 2019

**VIA ECFS**

Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12th Street, SW  
Washington, DC 20554

Re: *Misuse of Internet Protocol (IP) Captioned Telephone Service*, CG Docket No. 13-24;  
*Telecommunications Relay Services and Speech-to-Speech Services for Individuals with  
Hearing and Speech Disabilities*, CG Docket No. 03-123; *Petition for Declaratory  
Ruling and/or Rulemaking on Live Closed Captioning Quality Metrics and the Use of  
Automatic Speech Recognition Technologies*, CG Docket No. 05-231

Dear Ms. Dortch,

On September 27, 2019, Rylin Rodgers of the Association of University Centers on Disabilities, Keri Gray of the American Association of People with Disabilities, Susan Prokop of the Paralyzed Veterans of America, Danielle Applegate of VetsFirst, and the undersigned of the World Institute on Disability—representing the Clear2Connect Coalition—met with Travis Litman, Chief of Staff and Senior Legal Advisor to Commissioner Rosenworcel, and Randy Clarke, Acting Legal Advisor for Wireline and Public Safety to Commissioner Starks.

During the meetings, we introduced the Clear2Connect Coalition and explained the need for quality captioned telephone service for consumers with hearing loss.<sup>1</sup> In particular, we reiterated the Clear2Connect Coalition’s concerns about the introduction of Internet Protocol Captioned Telephone Services (“IP CTS”) that generate captions exclusively via automatic speech recognition (“ASR”) technologies.<sup>2</sup> As the Clear2Connect Coalition has explained, it would be premature to introduce such services until the Commission has adopted service quality standards specifically for ASR technologies.<sup>3</sup> Moreover, the testing of ASR technologies to date does not demonstrate that they can satisfy the mandate of the Americans with Disabilities Act that telecommunications relay services, like IP CTS, enable “functionally equivalent”

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<sup>1</sup> The Clear2Connect Coalition’s website has additional information, including videos regarding the status of automatic speech recognition (“ASR”) technologies. *See* <https://clear2connect.us/the-issue/>.

<sup>2</sup> *See* Comments of the Clear2Connect Coalition, CG Docket Nos. 03-123, 05-321 (Sept. 25, 2019) (“*Clear2Connect Comments*”); Letter from the Clear2Connect Coalition Members to Marlene H. Dortch, Secretary, FCC, CG Docket Nos. 13-24, 03-123 (May 14, 2019) (“*Clear2Connect Ex Parte*”).

<sup>3</sup> *See Clear2Connect Comments* at 4-5; *Clear2Connect Ex Parte* at 3, 9-11.

communications by telephone.<sup>4</sup> The Clear2Connect Coalition also reiterated its concerns regarding algorithmic bias and privacy related to the training of ASR engines.<sup>5</sup>

We also noted our support for the petition for rulemaking filed by Telecommunications for the Deaf and Hard of Hearing, Inc., National Association of the Deaf, Hearing Loss Association of America, Association of Late-Deafened Adults, Cerebral Palsy and Deaf Organization, Deaf Seniors of America, Deaf/Hard of Hearing Technology Rehabilitation Engineering Research Center, Twenty-First Century Captioning Disability and Rehabilitation Research Project, Rehabilitation Engineering Research Center on Universal Interface & Information Technology Access, and National Technical Institute for the Deaf (collectively, the “Consumer Groups”).<sup>6</sup> The Consumer Groups have identified concerns about ASR-based closed captioning services similar to those that we have identified for ASR-only IP CTS.

Please contact the undersigned or any member of the Clear2Connect Coalition if you have additional questions

Respectfully submitted,

/s/ Loretta Herrington

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cc: Travis Litman  
Randy Clarke

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<sup>4</sup> 47 U.S.C. § 225; *see also Clear2Connect Comments* at 6; *Clear2Connect Ex Parte* at 2-3, 11.

<sup>5</sup> *See Clear2Connect Comments* at 4-5; *Clear2Connect Ex Parte* at 3-5.

<sup>6</sup> *See Clear2Connect Comments* at 9-10.