October 4, 2019

**Via Electronic Filing**

Ms. Marlene H. Dortch

Secretary

Federal Communications Commission

445 12th Street, SW

Washington, DC 20554

**RE: CG DOCKET Nos. 13-24, 03-123**

Dear Ms. Dortch,

The Telecommunications Equipment Distribution Program Association (TEDPA) commends companies for their efforts in advancing communications that will affect Deaf, Hard of Hearing, DeafBlind, and persons with Combined Vision and Hearing Loss (CVHL) in both their professional lives and personal lives. More individuals are utilizing technology for distance communications in a variety of ways.

With any new technology, our members evaluate whether or not it is accessible for the populations we serve. In general, advanced technology is not for everyone. There are a variety of reasons why distance communications equipment can be more cumbersome, which is where Internet Protocol Captioned Telephone Service (IP CTS) comes into play.

In previous reports and filings, TEDPA and many other agencies have expressed a continued concern related to IP CTS misuse, waste, abuse, and fraud. After reading the proposals from the three Automatic Speech Recognition (ASR) providers to become certified as IP CTS providers, it appears that only one company attempted to address this concern.

Self-certification does not ask or assess for disabilities that could affect the use of IP CTS or promote other assistive technology that might be more accessible to the individual. Also, self-certification does not address literacy competency. Our members receive calls and emails on a daily basis from persons who say they are deaf, yet we discover their hearing as being in the mild to moderate range, but not severe or profound. They think they need the captioned telephone but then discover through the intervention of our members that an amplified phone or other device would be more appropriate.

How does the FCC define the word “necessitate”? Many peers, including hearing health professionals, cannot agree to or actually define the word necessitate as written. TEDPA members can often pair consumers up with equipment that not only addresses the hearing loss but also the underlying issues that may prevent effective communication.

TEDPA members would also like to understand more about how accuracy, completeness, synchronicity, and speed are going to be consistent and in line with the recommendations made by the subcommittee of the DAC October 2018 open meeting. Companies report measures but these are not fully addressed and it does not appear that an independent study has been levied. We would request that the FCC authorize an independent study of the speed, accuracy, completeness and delay produced via ASR prior to FCC authorization of this technology. Study participants should not be compensated for their time, as participant compensation sways participant opinion towards the positive.

We also recommend the FCC conduct an independent study and review information in other languages to again assure speed, completeness, accurate, and synchronicity of the dialogue. TEDPA recognizes the potential that ASR could be great at providing communication access to a greater portion of the general public, including those who do not speak English or Spanish. However, TEDPA questions how easy it will be for the general public to access the application (app) or captions in order to understand a call not due to hearing loss but a call due to an inability to understand the non-native speaker.

While ASR may reduce the overall cost of IP CTS, the ease of access for individuals who do not need captioning may offset any cost savings. TEDPA also questions whether ASR will be accessible for someone who is DeafBlind or has CVHL. Can ASR provide refreshable Braille access to the end user?

To reiterate, TEDPA appreciates the advances in distance communication technology which has made it possible for the citizens we serve to connect to their family, friends, and community. We share the FCC’s goal in reducing costs and abuse of IP CTS and appreciate the opportunity to share our comments and concerns.

Sincerely,

Sandra McNally, Chair

Nathan Gomme, Vice Chair

Kelly Robison, Secretary

Tiffany Wilson, Treasurer

CC: TEDPA Members­­­­