

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)	
)	
Petition for Waiver of Rules)	GN Docket No. 15-178
Requiring Support of TTY)	
Technology)	

REPORT

Upper Midwest Wireless, LLC (“UMW”), by its counsel, hereby reports on its progress toward meeting the Federal Communications Commission (“FCC” or “Commission”) real-time text (“RTT”) technology requirements in satisfaction of the reporting condition of its text telephone technology (“TTY”) waiver.

Pursuant to the Consumer and Governmental Affairs Bureau (“CGB”) of the FCC’s letter dated July 20, 2018, DA 18-755, CGB determined that the temporary, limited waiver of the Commission’s TTY support requirements granted to members of the Competitive Carrier Association (“CCA”) on April 20, 2016, continues to apply to UMW. CGB’s letter was in response to UMW’s request for such clarification, submitted because UMW is no longer a member of CCA. Specifically, UMW was a member of CCA on April 20, 2016 when the Commission issued the *CCA Waiver Order*¹ granting CCA members a waiver of the Commission’s TTY-related requirements for IP-enabled networks, and UMW elected to participate in the CCA Waiver.² UMW also was a member of CCA when the Commission extended the time period of the CCA Waiver to each carrier’s earliest date of RTT compliance,

¹ *Petition for Waiver of Rules Requiring Support of TTY Technology*, Order, 31 FCC Rcd 3778 (2016) (“*CCA Waiver Order*”).

² See Competitive Carriers Association, Preliminary Report, GN Docket No. 15-178 (filed July 19, 2016).

or June 30, 2020, in the *RTT Technology Order*.³

UMW reports that it is in the same position as described in its sixth waiver and progress report dated April 18, 2019. UMW does not currently offer IP-based wireless services but is committed to implementing industry standard capabilities to support interoperable RTT solutions and backward capability with TTY when it begins to offer such services. UMW also will ensure that 911 calls are delivered in accordance with the applicable obligations to transmit 911 calls to appropriate PSAPs or emergency authorities. Should UMW's circumstances change, UMW will update the Commission.

UMW requests the Commission consider this statement as compliance with the reporting requirements for the progress report due October 8, 2019.

Respectfully submitted,



Donald L. Herman, Jr.
Clare L. Andonov
Counsel for Upper Midwest Wireless, LLC

October 8, 2019

³ *In re Transition from TTY to Real-Time Text Technology Petition for Rulemaking to Update the Commission's Rules for Access to Support the Transition from TTY to Real-Time Text Technology, and Petition for Waiver of Rules Requiring Support of TTY Technology*, Report and Order and Further Notice of Proposed Rulemaking, 31 FCC Rcd 13568 (2016).