

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554**

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

REPORT

On July 20, 2018, the Federal Communications Commission (“FCC” or “Commission”) granted the request of Comcast Corporation (“Comcast”) for a temporary waiver of any Commission rules that obligate a service provider to support text telephony (“TTY”) technology when it provides an Internet protocol (“IP”)-based wireless calling functionality.¹ In granting Comcast’s request, the Waiver Order required Comcast to file “with the Commission, and make available to their customers . . . , reports detailing their progress toward implementing” real-time text (“RTT”).²

Since the waiver was granted, Comcast has confirmed that its wireless users can access RTT in accordance with the requirements of the applicable Commission rules.³ More

¹ *Petition for Waiver of Rules Requiring Support of TTY Technology; Comcast Corporation*, Order, 33 FCC Rcd 6820 (CGB 2018) (“Waiver Order”).

² *Id.* ¶ 8.

³ *See generally 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 ¶¶ 66-67 (2016) (requiring providers to either offer a downloadable application or plug-in that supports RTT or to: (1) “implement in its core network the capability to support RTT”; (2) “offer at least one new handset that supports native RTT functionality”; (3) “for all authorized end user devices specified [after the relevant initial compliance date], include in future design specifications the requirement to support RTT”; and (4) by the specified subsequent compliance date, support RTT “for all new authorized user devices”) (“RTT Order”).

specifically, given Comcast's reliance in this context on its underlying wireless provider, Comcast has confirmed Verizon's implementation of RTT.⁴ As Verizon reports, it currently makes RTT available on a significant number of devices.⁵ Comcast engaged in independent testing to ensure that Verizon's RTT solution is interoperable with other services and devices that support RTT and has confirmed the implementation of Internet Engineering Task Force ("IETF") standard RFC 4103 on all Apple devices, as well as on a limited number of Android devices. As the Commission has recognized, this IETF standard supports interoperable RTT solutions and constitutes the "appropriate safe harbor standard for compliance with RTT interoperability requirements and certain performance objectives."⁶

Comcast also conducted testing to confirm that Verizon's RTT solution is backward compatible with TTY technology and capable of supporting certain basic features and capabilities available to users, including the ability to: (1) "initiate and receive RTT calls to and from the same telephone numbers for which voice calls can be initiated and received"; (2) "transmit and receive RTT communications to and from any 911 public safety answering point (PSAP) in the United States"; and (3) "send and receive text and voice simultaneously in both directions on the same call using a single device."⁷ Comcast similarly has engaged in testing designed to ensure that "all 911 calls made by persons seeking emergency assistance using [RTT] are delivered in accordance with the obligations of all telecommunications carriers, including wireless carriers, to transmit 911 calls to the appropriate PSAP or local emergency

⁴ Comcast sought a waiver to address circumstances in which Comcast users obtain service directly via resold Verizon wireless service and in which Comcast offers users the ability to make and receive wireless voice calls over a Wi-Fi connection. Comcast has now confirmed that its users can access Verizon's RTT solution in both calling scenarios.

⁵ Verizon, *Real-time Text*, <https://www.verizon.com/about/accessibility/real-time-text>.

⁶ RTT Order ¶ 30; *see also* 47 C.F.R. § 67.2(a)-(b).

⁷ 47 C.F.R. § 67.2(c).

authority.”⁸ Finally, Comcast continues to actively work with device manufacturers and suppliers to ensure that all new devices deployed going forward include RTT functionality.

Given the measures described above, Comcast now supplies RTT in accordance with any and all applicable Commission rules in lieu of supporting TTY technology.⁹ As a result, Comcast no longer requires the waiver granted by the Commission in this proceeding in July 2018, although Comcast will continue to comply with the “notice conditions imposed in the [Waiver Order] . . . until the full implementation of the [RTT] rules.”¹⁰

Respectfully submitted,

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⁸ Waiver Order ¶ 7.

⁹ RTT Order ¶ 23 (“any wireless provider or manufacturer covered under Parts 6, 7, 14, 20, and 64 that supports RTT on IP networks in compliance with the RTT support provisions adopted in this Report and Order will be relieved of all TTY support requirements on IP and legacy wireless networks”); *id.* ¶ 71 (“[T]o provide an incentive for early implementation of RTT, we will allow for simultaneous relief. Therefore, a provider or manufacturer that achieves early compliance with the RTT support requirements will be relieved of those [TTY-related] obligations as of the date upon which such provider or manufacturer achieves such compliance.”).

¹⁰ *Id.* ¶ 74.