

Submitted electronically

October 12, 2018

Marlene H. Dortch
Secretary, Office of the Secretary
Federal Communications Commission
445 12th Street, SW, Room TW-A325
Washington, DC 20554

RE: NOTICE OF EX-PARTE - CG Docket No. 03-123 and CG Docket No. 13-24

Dear Ms. Dortch:

On October 10, Dr. Lisa Christensen, Dr. Jackie Clark, Dr. Jodi Baxter, and Kitty Werner, representing the American Academy of Audiology (“the Academy”), met jointly with Karen Peltz Strauss, Deputy Bureau Chief, Consumer and Governmental Affairs Bureau (“CGB”), Eliot Greenwald, Deputy Chief Disability Rights Office (“DRO”), Michael Scott, DRO, Andrew Mulitz, Office of the Managing Director (“OMD”), and Nathaniel Amann, DRO to discuss the IP CTS proposals found in CG Docket No. 03-123 and CG Docket No. 13-24 and the comments that the Academy filed in this proceeding.¹

The Academy reiterated the educational, clinical, technical training that audiologists undergo in obtaining their AuD or PhD as well as the nuance of treating and addressing hearing loss. The Academy also provided further context to the scope of a full hearing examination prior to an audiologist authorizing a captioned phone, including examples of the holistic analysis by audiologists to documenting necessity for a patient’s use of technology like an IP captioned telephone.

The FCC also explained in detail their concern regarding the over-utilization of captioned telephones. The Academy agreed that there are areas that we can jointly work with the FCC on educating our own members as to the IP CTS regulations and guidelines for usage by our patients. We also can further work with our patients on ensuring that individuals in a household who are not authorized to be using an IP captioned telephone know that they should not be using that device. Discussion also centered on strategies for education about assessment practices and the requirements of the federal program for IP CTS. Additionally, the Academy

¹ Comment filed by American Academy of Audiology. September 7, 2018.
<https://ecfsapi.fcc.gov/file/10907803529513/AAA%20FCC%20response%20FINAL%209.7.pdf>

and the FCC discussed strategies that included further education and communication to better articulate FCC concerns to providers.

The Academy looks forward to continuing to work with the FCC to find new ways to educate audiologists on the importance of a strong IP CTS program for consumers as well as regulations promulgated through this action. The Academy is excited to continue to work with the FCC on this critical issue as throughout the coming months. Please contact me directly with any questions that you may have on this matter.

Sincerely,

/s/

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