October 13, 2017

**VIA ELECTRONIC FILING (ECFS)**

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

RE: Notice of *Ex Parte* Meeting  
In the Matter of Accelerating Wireline Broadband Deployment by Removing Barriers to Infrastructure Investment  
**WC Docket No. 17-84**

Dear Ms. Dortch:

On Thursday, October 12, 2017, Kevin Colwell, Vice President, Ultratec, Inc. had a phone conversation with Terri Natoli, Deputy Division Chief, Competition Policy Division, Wireline Competition Bureau; Michele Berlove, Wireline Competition Bureau; Karen Peltz Strauss, Deputy Chief of Consumer and Governmental Affairs Bureau; Suzy Rosen Singleton, Chief, Disability Rights Office; and Susan Bahr, Disability Rights Office to discuss the above-referenced proceeding. Christian Vogler, Director of the Gallaudet University Technology Access Program; Gregg Vanderheiden, Professor, University of Maryland; were also participants on the call.

We discussed how TTYs and analog captioned telephone services are affected by the telecommunications network transition from analog to IP-based services.

We explained how TTY that use low speed tone based signaling can sometimes work on IP based services but there are a number of characteristics of some IP networks that may result in inconsistent or poor performance. This also true for other devices like analog based security systems and analog captioned telephones.

Some commenters and ex pate filings on this proceeding have stated that their digital or IP networks are compatible with TTY services. We are unaware of any testing to confirm the compatibility and for it to be affective both endpoints and the intermediate transport links would need to include this support. While there may be a statement of support for TTY communication compatibility in the record, commenters’ acknowledge that other legacy analog data devices like fax machines or security systems are more likely to have issues with IP based services. Analog captioned telephones may be similarly affected.

There have been some reports from users of analog captioned telephones that after undisclosed changes to their telephone service their captioned telephone no longer worked reliable. We believe this to be a provider’s conversion from analog to IP based facilities and this is particularly a concern when the user has no knowledge of the change.

We discussed that there are products available to captioned telephone users that are designed to work on IP based telephone services. IP captioned telephones typically use a voice service, analog or IP, and an internet connection to the captioning service. It is also possible to provide IP captioned telephones that operate on only an internet connection.

We noted that a long term solution to these problems is to have communications equipment that is IP based and can provide end to end IP connectivity. It is expected that the fixed-line real-time text-capable devices will eventually be available for TTY users and IP-based captioned telephones for captioned telephone users. The key issue during this transition is how to effectively support users of traditional analog equipment while making the transition from analog equipment and service to IP based equipment and service.

Respectfully submitted,

Kevin Colwell.  
Vice President

Ultratec, Inc,