

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20553**

In the Matter of)	
)	
General Motors Holding LLC)	
Petition for Partial Waiver of Real-Time)	GN Docket No. 15-178
Text Minimum Functionality Requirements)	
)	

To: Chief, Consumer and Governmental Affairs Bureau

**General Motors Holding LLC Motion to Withdraw Petition for
Partial Waiver of Real-Time Text Minimum Functionality Requirements**

General Motors Holding LLC ("GM")¹ respectfully petitions the Federal Communications Commission ("Commission") for grant of the instant Motion to Withdraw ("Motion")² the above-captioned Petition.³ As noted in its Reply Comments,⁴ GM is deeply grateful to Telecommunications for the Deaf and Hard of Hearing, Inc. ("TDI")—and all of the corresponding groups—for their thoughtful submission, which questioned the necessity of the Petition. After submitting its filing, GM was pleased to speak with counsel to the commenters, the Samuelson-Glushko Technology Law & Policy Clinic ("Clinic"), for the purpose of receiving and listening to their thoughts regarding the updated

¹ For purposes of this proceeding, GM includes all of its affiliates and subsidiaries, which include GM Cruise Holdings LLC and all of its subsidiaries.

² See 47 CFR § 1.8.

³ See Petition for Waiver of General Motors LLC, GN Docket No. 15-178 (filed Dec.11, 2018); *see also Consumer and Governmental Affairs Bureau Invites Comment on a Petition Filed by General Motors Holding LLC for Partial Waiver of Real-Time Text Minimum Functionality Requirements*, GN Docket No. 15-178, Public Notice DA 18-1301, (rel. Dec. 26, 2018).

⁴ See Reply Comments of General Motors LLC, GN Docket No. 15-178 (filed Feb. 19, 2019).

information set forth in the Reply Comments.⁵ The discussion helped lead GM to agree that the Petition is not necessary.

As set forth below and consistent with our Reply Comments, we discussed that, once available to the general public,⁶ the Cruise AV in-vehicle customer support function would provide non-interoperable RTT-to-RTT communication (as between AV riders and customer support personnel); non-interoperable transmission and receipt of RTT communication from public safety entities (with immediate intervention and assistance from customer support personnel), and non-interoperable simultaneous voice and RTT communication (as between AV passengers and customer support personnel). In addition, we reiterated that passengers will have the ability to engage in interoperable communication with customer support—or any other party—by using their personal smartphones. Therefore, GM hereby moves to withdraw the Petition.

In seeking to resolve the questions raised in the Clinic Comments, GM started the discussion by clarifying that the Commission's Real-Time Text ("RTT") rules do not apply to the GM Cruise AVs currently testing in San Francisco, Detroit, and Phoenix because the vehicles will offer a non-interoperable, non-interconnected telematics service rather than interoperable, interconnected communications. Citing the 2016 RTT Order,⁷ GM pointed to the Commission's conclusions that interoperability is a "minimum functionality of RTT"⁸ and that "effective RTT communications can only

⁵ See Comments of Telecommunications for the Deaf and Hard-of-Hearing, Inc., Nat'l Ass'n of the Deaf, *et al.*, GN Docket No. 15-178 (filed Jan. 30, 2019) ("Clinic Comments").

⁶ The Cruise AV is not yet generally publicly-available and is being tested and evaluated in California, Arizona and Michigan. See Reply Comments at 1.

⁷ See *Transition from TTY to Real-Time Text Technology, Petition for Rulemaking to Update the Commission's Rules from TTY to Real-Time Text Technology and Petition for Waiver of Rules Requiring Support of TTY Technology*, Report and Order, 31 FCC Rcd 13568 (2016).

⁸ *Id.* Rcd at 13584 ¶ 25 ("we conclude that RTT communications must be interoperable").

be achieved if the communications transmissions ... must be interoperable”⁹ Given its relevance, GM also cited the 2003 Telematics Order in which the Commission recognized that telematics service “does not use the interconnected public switched network” and, as a non-interoperable system, cannot transmit and receive wireless calls between the driver and other wireline or wireless users.¹⁰

Next, GM underscored that the customer support functionality in the Cruise AVs would have accessible features nonetheless. Specifically, when they become generally available to the public, the vehicles would provide passengers two options by which to communicate with customer support personnel. First, either by pressing the in-vehicle service button or typing on the in-vehicle devices, passengers would connect to the non-interoperable telematics system, which in turn would facilitate a non-interoperable voice and/or RTT communication with customer support. Second, by accessing the Cruise-branded app on their personal smartphones, passengers would have the ability to engage in interoperable voice and/or RTT communication with customer support. Finally, GM reconfirmed that passengers using their own devices would have access to all of the services they receive from their underlying wireless providers, just as they would expect.

In sum, whether through the in-vehicle service button or accessible devices, the passengers’ personal smartphones, or a combination of the three, these options would afford blind, low-vision, deaf, and hearing-impaired passengers a 24-7, 365 communication experience.

Conclusion. As set forth in GM’s Reply Comments and echoed in the company’s discussion with Clinic counsel, once available to the general public, the Cruise AV in-vehicle customer support function would provide:

⁹ [sic.] *id.* at ¶ 27.

¹⁰ See *Revision of the Commission’s Rules to Ensure Compatibility With Enhanced 911 Emergency Calling Systems*, Order, 18 FCC Rcd 21531, 21535 ¶ 8 (“OnStar Telematics Order”).

- non-interoperable RTT-to-RTT communication (as between AV riders and customer support personnel);
- non-interoperable RTT communication with public safety entities (with immediate intervention and assistance from customer support personnel, a process upon which the Commission has favorably passed);¹¹ and
- non-interoperable simultaneous voice and RTT communication (as between AV passengers and customer support personnel).

And, on top of these capabilities, passengers will always have the ability to engage in interoperable communication with customer support—or any other party—by using their personal smartphones.

Accordingly, GM requests that the Commission grant this motion to withdraw its Petition.

Respectfully submitted,

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¹¹ See OnStar Telematics Order.