

**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

On December 18, 2015, the Commission granted the request of Cellular South, Inc. (“Cellular South”) for a waiver of applicable TTY-related requirements for its IP-enabled wireless services in the same manner and with the same conditions as the waiver the Commission previously granted to Verizon.¹ In granting Cellular South’s request, the *Order* required Cellular South to file every six months:

a report with the Commission ... regarding its progress toward and the status of the availability of new IP-based accessibility solutions, such as RTT. Such report[] shall include, but not be limited to, information on the interoperability of Cellular South’s selected accessibility solution with the technologies deployed or to be deployed by other carriers and service providers, as well as the backward compatibility of such solution with TTYs. The information on such capabilities of Cellular South’s IP-based accessibility solutions, including RTT, must include a showing of Cellular South’s efforts to ensure delivery of 911 calls to the appropriate PSAP. Additionally, Cellular South must continue to coordinate with PSAPs on implementing text-to-911 service. To the extent there are obstacles to achieving interoperability with other providers’ solutions and compatibility with TTYs, the report shall describe such obstacles in detail, state what steps are being taken to overcome them, and provide an estimated timetable for the successful deployment of accessibility solutions.²

¹ *Petition for Waiver of Rules Requiring Support of TTY Technology*, DA 15-1458, Order (Dec. 18, 2015) (“*Order*”).

² *Cellular South Waiver Order* at ¶ 13.

Cellular South filed its first progress report on March 17, 2016 and its second progress report on June 17, 2016. Cellular South has subsequently filed progress reports every six months since June 17, 2016.

Cellular South has implemented industry standard capabilities in its 4G LTE network, including the Internet Engineering Task Force (IETF) standard RFC 4103, that it will use to support interoperable real time text (“RTT”) solutions. Based on implementation of industry standard-based technology in the network, Cellular South is actively working to ensure functionality, accessibility, interoperability between networks, and interoperability with legacy TTY devices. By basing its transmission protocol for RTT transmission on recognized industry standards, Cellular South’s development of RTT will promote the wider availability of interoperable RTT.

Cellular South will initially deploy an application-based over-the-top (“OTT”) RTT solution in order to meet the Commission’s transition deadline. Cellular South is discussing with vendors the development of the OTT RTT solution.

Cellular South is monitoring the efforts of the big four wireless carriers to reach agreements with device manufacturers to provide an RTT solution embedded within mobile devices. Cellular South plans to introduce devices with an embedded RTT solution shortly after such devices become available.

Cellular South plans to negotiate use of a third party RTT-TTY internetworking gateway that will allow RTT users to communicate with TTY users, including E911 emergency services. E911 call delivery will be advanced upon resolution of the backward compatibility solution described in the previous sentence.

Respectfully submitted,

/s/ Jeff Cook



Jeff Cook
Technical Project Manager
Cellular South, Inc. (C Spire)
1018 Highland Colony Parkway
Suite 400
Ridgeland, MS 39157

Robert S. Koppel
Lukas, LaFuria, Gutierrez & Sachs, LLP
8300 Greensboro Dr.
Suite 1200
Tysons, VA 22102
(703) 584-8669
Counsel to Cellular South (C Spire)

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