



The Nation's Voice for People with Hearing Loss

July 18, 2017

Via Electronic Filing

Ms. Marlene Dortch, Secretary
Federal Communications Commission
445 Twelfth Street, SW
Washington, DC 20554

Re: Notice of *ExParte*: Misuse of Internet Protocol Captioned Telephone Service (IP CTS) and Speech-to-Speech for Individuals with Hearing and Speech Disabilities, CG Docket Numbers 13-24, 03-123.

Dear Ms. Dortch,

On June 17, 2017, Lise Hamlin, Director of Public Policy for Hearing Loss Association of America (HLAA) and Linda Kozma-Spytek, of the Deaf/Hard of Hearing Technology RERC at Gallaudet University, met with Karen Peltz Strauss, Eliot Greenwald, Bob Aldrich, Sarah Burgart of the Commission's Consumer and Government Affairs Bureau and David Schmidt of the Office of Managing Director.

The purpose of the meeting was to discuss Internet Protocol Captioned Telephone Service (IP CTS) from the perspective of consumers who use the service. Many of the consumers HLAA represents depend on this service to ensure they can communicate on the telephone.

HLAA emphasized the need to continue this program and ensure that IP CTS phones and services reach the people who need it. We noted that we still get reports from people who could benefit from the program, but had not heard about it. We discussed the need for audiologists and hearing aid dispensers to have access to information about all providers of captioned phones so they can inform consumers about the full range of options

available to them. In addition, those consumers who need the service should not have to jump through hoops to prove they are eligible.

HLAA also expressed concerns about the quality of IP CTS. We indicated our support for the development of quality standards and for providers to adhere to the standards.

We discussed that we have heard concerns from some state administrators of equipment distribution programs about the possibility that administration of the IP CTS program will be turned over to them. They are concerned they will not have the resources to properly administer the program. HLAA suggests that caution should be taken before turning over the program to entities that have few or inadequate resources or little to no experience serving consumers with hearing loss who can benefit from IP CTS.

We look forward to continued work with the FCC on this issue.

Sincerely,

/s/ Lise Hamlin
Director of Public Policy

cc: Karen Peltz Strauss
Eliot Greenwald
Bob Aldrich
David Schmidt