

**Before the  
Federal Communications Commission  
Washington, D.C. 20554**

In the Matter of	)	
	)	
Petition for Waiver of Rules Requiring Support of TTY Technology	)	GN Docket 15-178
	)	

**PETITION FOR WAIVER**

The Law Offices of Hill & Welch, on behalf of Raicom, Inc.<sup>1</sup> (“Petitioner”), hereby seeks a waiver of Section 20.18(c) and other Commission rules which would require IP-based 700 MHz service offerings to be compatible with TTY technology. The Commission has recently granted several TTY waivers, including the waiver granted in *Competitive Carriers Association*, DA 16-435, released April 20, 2016. Petitioner request a similar rule waiver for its own rural market.<sup>2</sup> In support whereof, the following is respectfully submitted:

1) Petitioner is a rural carrier which is currently building out its 700 MHz system to provide Internet access service. Petitioner is not currently providing, and does not plan to provide, voice mobile radio service or VoIP service over its 700 MHz system. However, Petitioner seeks waiver

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<sup>1</sup> Raicom, Inc. is the Licensee of 700 MHz Block B2 Station WQMX965 CMA540 Nebraska 8 - Chase. This license covers six counties and 23,660 persons according to the 2010 Census. The land area is 4,949 sq. miles, yielding a population density of 4.8 persons per square mile.

<sup>2</sup> See *Facilitating the Provision of Spectrum-Based Service to Rural Areas and Promoting Opportunities for Rural Telephone Companies to Provide Spectrum-Based Services*, WT Docket No. 02-381, *2000 Biennial Regulatory Review Spectrum Aggregation Limits For Commercial Mobile Radio Services*, WT Docket No. 01-14, *Increasing Flexibility To Promote Access to and the Efficient and Intensive Use of Spectrum and the Widespread Deployment of Wireless Services, and To Facilitate Capital Formation*, WT Docket No. 03-202, *Report and Order and Further Notice of Proposed Rulemaking*, 19 FCC Rcd 19078 ¶ 11 (FCC 2004) (defining “rural area” in the wireless services as those counties with a population density of 100 people per square mile or less, based upon the most recently available Census data).

of the TTY requirement out of an abundance of caution in the event it changes its service offering to include a voice service.

2) Petitioner currently has no plans to deploy an alternative TTY accessibility solution by December 2017. Petitioner is a small rural carrier which is unable to affect the equipment marketplace. Petitioner does not deal directly with OEMs regarding the development, production, or ordering of 700 MHz telecommunications equipment. Therefore, Petitioner is not currently involved in any activity to develop RTT as an IP-based alternative to TTY. Petitioner will deploy RTT or other TTY substitute equipment as industry standards and Commission rules require at such time as such equipment is made available to Petitioner. Petitioner is not involved with developing industry standards and is not aware whether RFC4103 will be a required standard.

WHEREFORE, in view of the information presented herein, it is respectfully submitted that Petitioner has presented facts which counsel for waiver of the Commission's rules which would require provision of TTY service over its 700 MHz systems. Waiver through December 31, 2017 is requested or upon the effective date of rules providing for alternative IP-based accessibility solutions, whichever is earlier.

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Respectfully submitted,  
Raicom, Inc.

/s/ Timothy E. Welch  
Its Attorney