

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)	
)	
Transition from TTY to Real-Time Text Technology)	CG Docket No. 16-145
)	
Petition for Rulemaking to Update the Commission’s Rules for Access to Support The Transition from TTY to Real-Time Text Technology, and Petition for Waiver of Rules Requiring Support of TTY Technology)	CN Docket No. 15-178
)	
)	

REPLY COMMENTS OF ZVRS

CSDVRS, LLC. d/b/a ZVRS (“ZVRS”) hereby replies to the comments filed in response to the Commission’s Notice of Proposed Rulemaking (“NPRM”) regarding the implementation of Real-time Text (“RTT”) services.¹ The NPRM seeks various ways to facilitate the transition from an outdated text messaging technology, TTY to a modern text-based technology, RTT. The TTY was originally designed more than a half century ago for individuals who are deaf, deaf-blind and hard-of-hearing as their sole tool for remote communication. Today, these individuals have by far greater communication options.

While ZVRS supports the Commission’s efforts in promoting the availability and use of RTT, ZVRS submits reply comments in response to inquiries with respect to the video relay service (“VRS”) role with RTT. Specifically, the NPRM seeks comment on whether RTT “can

¹ *Transition from TTY to Real-Time Text Technology; Petition for Rulemaking to Update the Commission’s Rules for Access to Support the Transition from TTY to Real-Time Text Technology, and Petition for Waiver of Rules Requiring Support of TTY Technology*, Notice of Proposed Rulemaking, FCC 16-53, CG Docket No. 16-145; GN Docket No. 15-178, (rel. Apr. 29, 2016) (“NPRM”).

reduce reliance on relay services and thereby provide greater privacy and independence” than TRS.² The NPRM also seeks whether it should “amend its TRS rules to authorize or require TRS providers to incorporate RTT capabilities into platform and terminal equipment used for certain forms of TRS.³

RTT, as compared to several of the existing text messaging services, has proven to be a promising text service that many consumers, especially those who are deaf and hard of hearing, have not yet experienced the benefits of a real-time conversation RTT has to offer. Although one can simply download an application for RTT use, RTT is not widely used by the public yet, and therefore is not commonly used by individuals who are deaf, deafblind and hard-of-hearing. Its noteworthy to state that VRS remains as a popular communication tool used by those individuals. With that said, to suggest that VRS incorporate RTT capabilities into platform and users end point equipment would reduce consumers’ reliance on VRS might not be entirely accurate- echoing what Sorenson noted in its comments that VRS provides a functionally equivalent service that cannot be replaced by RTT.⁴ Should consumers wish to use text to reach out to someone, he or she would text directly or use Internet protocol relay service (“IP Relay”). Ideally, IP Relay could upgrade its platform to include RTT capabilities. Consumers who choose to make calls via VRS consciously use its service rather than texting, mainly because VRS captures and delivers greater information such as cues and facial expressions in sign language on video rather than text alone. However, ZVRS undoubtedly agrees that RTT would benefit VRS users in certain circumstances such as placing calls in area that has poor reception which affects the quality of the video connection. RTT could be used as an alternative feature in a VRS call

² *Id.* ¶ 35.

³ *Id.* ¶ 78.

⁴ Comments of Sorenson Communications, Inc. and CaptionCall, LLC. at 4, CG Docket No. 16-145 and GN Docket No. 15-178 (filed Jul. 11, 2016).

with a poor video connection, especially in an urgent or emergency call when every typed letter matters.

For the reasons highlighted above, ZVRS is amendable to idea of including RTT as a supplement to VRS on a voluntary basis. RTT could be offered as a value-added feature, but not as a mandatory feature built into the VRS platform. As stated, ZVRS supports the Commission's efforts for facilitating the transition to RTT, but believe VRS is not the appropriate vehicle for promoting such an effort.

Respectfully submitted,
/s/
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