September 5, 2017

*Via Electronic Filing*

*Ex parte*

Marlene H. Dortch

Secretary

Federal Communications Commission

445 Twelfth Street SW

Washington, DC 20554

Re: WC Docket No. 17-84, *Accelerating Wireline Broadband Deployment by Removing Barriers to Infrastructure Investment*

Dear Ms. Dortch:

AT&T Services, Inc. files this *Ex Parte* in response to the August 22, 2017 *Ex Parte* filed by Ultratec, Inc. discussing the provision of TTYs using fiber and VoIP connections.[[1]](#footnote-1) In its *Ex Parte*, Ultratec describes the operation of TTY over fiber facilities. “[F]iber generally is not a problem if a [TTY] customer receives TDM-like, POTS-equivalent services via the fiber connection.”[[2]](#footnote-2) This statement appears to demonstrate that retiring copper and replacing it with fiber facilities does not affect the provision of TTY.[[3]](#footnote-3) AT&T agrees. Ultratec also makes statements concerning the performance of TTYs over VoIP.[[4]](#footnote-4) It is not clear from the context to which types of VoIP services (interconnected VoIP, non-interconnected VoIP, wireless VoIP) Ultratec is referring. To the extent Ultratec is referring to all VoIP services generally, AT&T does not believe Ultratec’s blanket performance characterizations are correct regarding all interconnected VoIP services.

Interconnected VoIP services are compatible with TTY.[[5]](#footnote-5) While bandwidth limitations, which can affect the provision of TTY over wireless VoIP networks, can also occur on IP-based wireline networks, these limitations are often resolved through quality of service safeguards and other technologies. Indeed, AT&T has used quality of service safeguards and other technological measures to reliably support TTY use with U-verse Voice, a wireline VoIP service.[[6]](#footnote-6)

Any assertion that TTY is inoperable or incompatible with all interconnected VOIP services is not supported by the record. If you have any questions or need additional information, please do not hesitate to contact me.

Sincerely,

/s/ Ola Oyefusi

1. *Ex Parte* Letter from Kevin Colwell, Ultratec, Inc., to Marlene H. Dortch, Secretary, FCC, WC Docket No. 17-84 (Aug. 22, 2017). [↑](#footnote-ref-1)
2. *Id*. [↑](#footnote-ref-2)
3. The statement also defeats the notion, advanced by some parties, that continued mandated notice under §68.110(b) is needed to ensure that TTY users are protected when copper is replaced by fiber facilities. *See e.g.,* Reply Comments of Communications Workers of America at 11 (The FCC should retain §68.110(b) of the rules that require advance notice of any network change that would impact a customer’s TTY equipment.). As AT&T’s comments make clear, the requirements of §68.110(b) have outlived their usefulness and have no practical relevance in the network change/copper retirement process. *See* AT&T Comments at 35-37; AT&T Reply Comments at 27-30. [↑](#footnote-ref-3)
4. *Id*. (“However, using a TTY device over a VOIP service, whether carried on fiber or copper facilities, can result in garbled text. The TTY may perform inconsistently, sometimes working acceptably and other times seeming unusable.”). [↑](#footnote-ref-4)
5. *See e.g.,* VON Coalition: Benefits of VOIP/People with Disabilities (“The interconnected VOIP Industry has worked to develop standards and implement technology that is interoperable with TTY devices.”) <http://von.org/secpgs/02_benefits/benefits_06_disabilities.html> (last checked 09/05/2017); Letter from Diane B. Burstein, NCTA, to Marlene H. Dortch, Secretary, FCC, CG Docket No. 16-145, *In the Matter of Transition from TTY to Real-time Text Technology,* (Dec. 8, 2016) (“[T]he record shows that wireline VoIP providers support TTY transmissions from consumers . . ..”). [↑](#footnote-ref-5)
6. *See* AT&T Comments, CG Docket No. 16-145, *In the Matter of Transition from TTY to Real-time Text Technology*, 15, (July 11, 2016). [↑](#footnote-ref-6)