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September 9, 2016

VIA ELECTRONIC FILING (ECFS)

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

RE: **EX PARTE PRESENTATION**
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
GN Docket No. 15-178

Dear Ms. Dortch:

On September 7, 2016, Dixie Ziegler and Jeff Knighton of Hamilton Relay, Inc. ("Hamilton"), and the undersigned counsel on behalf of Hamilton, met with Karen Peltz Strauss of the Commission's Consumer and Governmental Affairs Bureau ("Bureau"), and Suzanne Singleton, Eliot Greenwald, and Michael Scott of the Bureau's Disabilities Rights Office.

During the meeting, the participants discussed the attached presentation regarding critical elements of the Commission's proposed transition from traditional TTY services for the deaf and the hard of hearing to Real-Time Text ("RTT") technology. In particular, Hamilton emphasized that wireless carriers need to deliver RTT messages to Telecommunications Relay Service ("TRS") providers in IP format, and not in Baudot TTY format. TRS providers can and should be responsible for handling the protocol conversion between RTT and TTY. In order for relay providers to receive such RTT messages in IP format, wireless carrier and relay provider networks must meet at a common access point, such as a carrier hotel.

As Hamilton noted in its comments and reply comments in this proceeding, relay providers can and should function as common gateways for protocol conversion between RTT and TTY during the backward compatibility period. This approach would be far more cost-effective, because it would obviate the need for each wireless carrier to build and maintain its own individual RTT-TTY gateway. A common gateway approach, in which TRS providers

serve as the entities responsible for RTT-TTY protocol conversion, would leverage existing TTY communication infrastructure to ensure a consistent user experience using proven technology, thus benefiting consumers. The gateway approach would only be needed until the PSTN sunsets.[1]

Finally, the parties discussed that under ATIS standards for RTT, the RTT functionality would likely be defaulted to the "off" mode so as to minimize the carrier costs involved in RTT-TTY protocol conversion. Hamilton encouraged the Commission to mandate that RTT functionality be defaulted to "on" so that consumers can maximize the benefits of the RTT experience without having to manually turn RTT capability on during phone calls. Hamilton noted that if TRS providers serve as the common gateway between RTT and TTY, the cost-saving approach of defaulting RTT to off would no longer be needed, since wireless carriers would not need to maintain RTT-TTY modem conversion on their networks, and instead could rely on TRS providers to perform that function.

This filing is made in accordance with Section 1.1206(b)(1) of the Commission's rules, 47 C.F.R. § 1.1206(b)(1). In the event that there are any questions concerning this matter, please contact the undersigned.

Respectfully submitted,

WILKINSON BARKER KNAUER, LLP

/s/ David A. O'Connor
Counsel for Hamilton Relay, Inc.

Enclosure
cc (via e-mail): Participants

[1] The parties also discussed the fact that RTT will not function in a 2G or 3G environment, even after the PSTN sunsets.