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September 15, 2016

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

Re: Notice of *Ex Parte*, CG Docket No. 16-145

Dear Ms. Dortch:

On September 13, 2016, representatives from the Alliance for Telecommunications Industry Solutions (ATIS), CTIA and the National Emergency Number Association (NENA) met in person and via telephone with representatives of the Commission's Office of Strategic Planning & Policy Analysis (OSP), Public Safety & Homeland Security Bureau (PSHSB), and Consumer and Governmental Affairs Bureau (CGB). The purpose of the meeting was to discuss issues related to Real-Time Text (RTT) raised by the Commission's *Notice of Proposed Rulemaking* (NPRM) released May 25, 2016, in the above-referenced docket.

During the meeting, the parties discussed issues raised in the docket, including the technical issues related to RTT-TTY backwards compatibility, the potential for existing network capabilities that support Text-to-911 to also support RTT-originated 9-1-1 communications with Public Safety Answering Points (PSAPs), and on-going discussions among stakeholders, including representatives from the disability rights community, about the default settings for RTT operations on a wireless handset in the development of ATIS standards. In addition to the points raised by ATIS below, the parties generally expressed a desire to engage the appropriate technical representatives within the parties' respective organizations to consider these issues.

Specifically, as noted in its comments, ATIS cautioned the FCC against any requirement for backwards compatibility of TTY and RTT devices in support of non-emergency calling due to a significant concern related to transcoder overloading and resulting potential for denial of service to RTT users of E9-1-1 and TRS 711 services. Representatives from ATIS explained that, when RTT-enabled phones are configured to accommodate all incoming calls from the circuit switched network as TTY calls, the network must reserve an RTT to TTY transcoder in case it may be needed for the call (i.e., a party activates an RTT session); otherwise, a transcoder may not be assigned and calls that begin as voice calls will not be able to transition to an RTT session. However, if an RTT call is initiated as RTT, ATIS noted that the transcoder overloading issue is less of a problem as normal traffic engineering practices can be applied. Therefore, ATIS representatives suggested that the Commission's proposed backwards compatibility requirements in the *NPRM* could have a significant impact on the industry and could require the industry to upgrade all transcoders to support RTT, or to develop more specific transcoding resourcing with the ability to assign instantaneously.

NENA representatives reiterated the importance of deploying RTT quickly and in a standards-compliant manner. Moreover, they explained the importance of considering PSAP operations impacts of the RTT transition, and providing PSAPs with implementation flexibility.

In attendance were the following Commission Representatives: Henning Schulzrinne, Chief Technology Officer (OSP); Bob Aldrich, Front Office Legal Advisor, Office of the Bureau Chief (CGB); Karen Peltz Strauss, Deputy Bureau Chief, Office of the Bureau Chief (CGB); Suzy Rosen Singleton, Chief, Disability Rights Division (CGB); Eliot Greenwald, Deputy Chief, Disability Rights Division (CGB); Darryl Cooper, Attorney Advisor, Disability Rights Division (CGB); Michael Scott, Attorney Advisor, Disability Rights Division (CGB); David Furth, Deputy Bureau Chief, Office of the Bureau Chief (PSHSB); Brenda Boykin, Attorney Advisor, Policy and Licensing Division (PSHSB); and Timothy May, Policy Analyst, Policy and Licensing Division (PSHSB).

In attendance representing ATIS were: Brian Daly (AT&T); Greg Schumacher (Sprint); Thomas Goode, ATIS General Counsel; and Steve Barclay, ATIS Director of Global Standards Development. In attendance representing CTIA were Matthew Gerst, Director of Regulatory Affairs and Kara Romagnino, Director of Regulatory Affairs. In attendance representing NENA were Brian Fontes, CEO, and Trey Forgety, Director of Governmental Affairs.

A copy of this ex parte notification is being filed in the above-referenced docket. If there are any questions, pertaining to this matter, please contact the undersigned.

Sincerely,



Thomas Goode
ATIS General Counsel

cc: Henning Schulzrinne, Chief Technology Officer (OSP)
Bob Aldrich, Front Office Legal Advisor, Office of the Bureau Chief (CGB)
Karen Peltz Strauss, Deputy Bureau Chief, Office of the Bureau Chief (CGB)
Suzy Rosen Singleton, Chief, Disability Rights Division (CGB)
Eliot Greenwald, Deputy Chief, Disability Rights Division (CGB)
Darryl Cooper, Attorney Advisor, Disability Rights Division (CGB)
Michael Scott, Attorney Advisor, Disability Rights Division (CGB)
David Furth, Deputy Bureau Chief, Office of the Bureau Chief (PSHSB)
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