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September 17th, 2018

VIA ECFS

Ms. Marlene H. Dortch
Office of the Secretary
Federal Communications Commission
455 12th Street, S.W.
Washington, DC 20554

RE: Comments in the Matter of Misuse of Internet Protocol (IP) Captioned Telephone Service CG Docket No. 13-24 and Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities CG Docket No. 03-123 Report and Order, Declaratory Ruling, Further Notice of Proposed Rulemaking and Notice of Inquiry

Dear Ms. Dortch:

Teltex, Inc. submits to the Commission the attached Comments in the Matter of Misuse of Internet Protocol (IP) Captioned Telephone Service CG Docket No. 13-24 and Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities CG Docket No. 03-123 Report and Order, Declaratory Ruling, Further Notice of Proposed Rulemaking and Notice of Inquiry.

Please let us know if you have any questions regarding this filing.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read "Andrew Bond", with a long horizontal line extending to the right.

Andrew Bond
President

Cc: Karen Peltz-Strauss
Eliot Greenwald
Michael Scott



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

In the Matter of)	
)	
Misuse of Internet Protocol (IP))	CG Docket No. 13-24
Captioned Telephone Service)	
)	
Telecommunications Relay Services)	
And Speech-to-Speech Services)	CG Docket No. 03-123
For Individuals with Hearing)	
And Speech Disabilities)	

COMMENTS BY TELTEXT, INC.

Teltext, Inc. submits these Comments in response to the Federal Communications Commission's (FCC's) report and Order, Declaratory Ruling, Further Notice of Proposed Rulemaking (FNPRM) and Notice of Inquiry (NOI) released on June 8th, 2018 in CG Docket Nos. 13-24 and 03-123. In particular, Teltext's Comments address Sections C and D of the FNPRM, which seek comment on the State Role in the administration of Internet Protocol Captioned Telephone Service (IP CTS) and in ensuring independent assessments of eligibility for IP CTS equipment.

I. Introduction

On June 8, 2018, the Federal Communications Commission ("FCC" or "Commission") released a Report and Order, Declaratory Ruling, Further Notice of Proposed Rulemaking, and Notice of Inquiry regarding Internet Protocol Captioned Telephone Service ("IP CTS").¹

¹ *Misuse of Internet Protocol (IP) Captioned Telephone Service; Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities*, Report and Order, Declaratory Ruling, Further Notice of Proposed Rulemaking, and Notice of Inquiry (June 8, 2018) (cited herein as *2018 IP CTS Reform Order*).



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II. Comments

C. State Role in the Administration of IP CTS

1. Intrastate Funding

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Teltex has no formal comment in regard to whether State TRS Programs should be required or permitted to administer intrastate funding for the costs of IP CTS to their residents.

Teltex has a formal comment in regard to whether State TRS Programs and/or State Telecommunications Equipment Distribution Programs (TEDPs) should be required or permitted to administer IP CTS equipment distribution to their residents.

As the experts in the field, State TEDPs should have the same discretion in IP CTS equipment distribution as they currently possess in reference to traditional equipment distribution (including but not limited to TTYs, amplified phones, etc). State TEDPs have distributed captioned telephone equipment for many years, with great success. Even with each State TEDP differing slightly in their statutes, rules, policies and procedures, State TEDPs have been able to ensure consumers receive the most appropriate telecommunications equipment for their specific needs.

Unlike the National DeafBlind Equipment Distribution Program (NDBEDP), which required many State TEDPs to provide equipment and services outside of their norm, with little to no expertise in the arena, State TEDPs fully possess the knowledge and expertise in evaluating and providing IP CTS equipment.

D. Ensuring Independent Assessments

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The State TEDPs possess the most qualified expertise to assess, evaluate and recommend the most effective equipment for telecommunications access. In addition, the State TEDPs possess the most qualified expertise in certifying consumers to their eligibility for IP CTS equipment.



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Teltext believes that Hearing Healthcare professionals are still necessary in the process for authenticating the consumer's hearing loss, but that the testing and evaluation of equipment should be placed under the guidance and administration of State TEDPs.

Hearing Healthcare professionals are already required to be knowledgeable in hearing health technologies such as hearing aids, Bluetooth, streamers, cochlear implants and more-while State TEDPs sole focus is technology for telecommunications and communications access. By having State TEDPs certify the consumer for equipment, it allows the true expert in the arena to make the independent assessment.

Last but not least, State TEDPs are completely neutral from the IP CTS Providers, ensuring that the assessment is truly independent. For States that do not have a TEDP, a solution would be to have a model similar to the NDBEDP, with an independent assessment entity providing the TEDP services.

States that do not currently have a TEDP, should be required to have a neutral Third-Party Entity to provide the assessment, evaluation, recommendation and certification for a consumer to receive IP CTS equipment.

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Teltext recommends that State TEDPs handle IP CTS user eligibility assessments, as an effective means of ensuring that such evaluations are sufficiently thorough and not biased toward the use of IP CTS.

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State TEDPs should be permitted to conduct the user screenings, as the State TEDPs have programs in place that effectively and efficiently complete this process already.

State TEDPs should be permitted to continue their program as it currently exists, and add the IP CTS equipment while maintaining their statutes, rules, policies and procedures. During this transition, the FCC could establish national standards and best practices to assist states in revising their current processes to add the IP CTS equipment to their distribution offerings.



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Cost analysis cannot be commented on at this time, as no data has been provided to the States by the IP CTS providers on the number of IP CTS devices already deployed, or when the existing consumers would be eligible for new or updated equipment.

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Teltex recommends that States that do not currently have a TEDP, should be required to have a neutral Third-Party Entity to provide the assessment, evaluation, recommendation and certification for a consumer to receive IP CTS equipment. The Third-Party Entity should have the necessary expertise to provide TEDP services, but not be an IP CTS Provider.

Teltex recommends Hearing Healthcare Providers continue to authenticate the consumer's hearing loss; while the Third-Party Entity certifies the consumer for IP CTS equipment.

Teltex agrees that the Third-Party Entity should be neutral with any personnel conducting assessments not have any business, family or social relationships with any IP CTS provider or personnel.

III. Conclusion

Teltex would welcome the opportunity to partner with the FCC to develop and implement a Research Study to test the feasibility of State TEDPs administering the assessment, evaluation, recommendation and certification of consumers for IP CTS equipment. Teltex would work in partnership with State TEDPs we currently work with.

In addition, Teltex would welcome the opportunity to partner with the FCC to develop and implement a Research Study focused on marketing and outreach of IP CTS equipment distribution. Teltex would work in partnership with State TEDPs we currently work with.

Lastly, Teltex would welcome the opportunity partner with the FCC to develop and implement a Research Study to provide Third-Party Entity solutions for States that do not currently have a TEDP. Teltex would work in partnership with State TEDPs we currently work with to exemplify their best practices in equipment distribution.



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Respectfully submitted this 17th day of September, 2018,

Teltex, Inc.

By: 

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