

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

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

**Reply Comments on Sprint Corporation's Petitions for Clarification and Reconsideration
of**

**Hearing Loss Association of America (HLAA)
Telecommunications for the Deaf and Hard of Hearing, Inc. (TDI)
National Association of the Deaf (NAD)
Association of Late-Deafened Adults (ALDA)
Cerebral Palsy and Deaf Organization (CPADO)
American Association of the Deaf-Blind (AADB)
Deaf Seniors of America (DSA)
California Coalition of Agencies Serving the Deaf and Hard of Hearing, Inc. (CCASDHH)
Deaf and Hard of Hearing Consumer Advocacy Network (DHHCAN)
Deaf/Hard of Hearing Technology Rehabilitation
Engineering Research Center (DHH-RERC)
Rehabilitation Engineering Research Center on Universal Interface &
Information Technology Access (IT-RERC)**

via electronic filing
September 17, 2018

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Pursuant to Rule 1.429(g)¹ and the Commission’s August 28, 2018 Public Notice in the above-referenced dockets,² the Hearing Loss Association of America (HLAA), Telecommunications for the Deaf and Hard of Hearing, Inc. (TDI), the National Association of the Deaf (NAD), the Association of Late-Deafened Adults (ALDA), the Cerebral Palsy and Deaf Organization (CPADO), the American Association of the Deaf-Blind (AADB), Deaf Seniors of America (DSA), the California Coalition of Agencies Serving the Deaf and Hard of Hearing, Inc. (CCASDHH), and the Deaf and Hard of Hearing Consumer Advocacy Network (DHHCAN) (“Consumer Groups”) and the Deaf/Hard of Hearing Technology Rehabilitation Engineering Research Center (DHH-RERC) and the Rehabilitation Engineering Research Center on Universal Interface & Information Technology Access (IT-RERC) respectfully reply to comments and oppositions filed regarding Sprint Corporation’s July 9, 2018 petition for clarification or reconsideration.³

We reiterate the general support for Sprint’s request for the Commission to clarify or reconsider its approach to allowing and evaluating IP CTS applications using automatic speech recognition (ASR) technology outlined in the July 26, 2018 ex parte of several of the Consumer Groups and DHH-RERC, which we incorporate by reference and attach here.⁴ Our perspective is consistent with the record of support for Sprint’s petition from Hamilton Relay and CaptionCall, LLC.⁵

More specifically:

- The Declaratory Ruling was procedurally deficient and denied stakeholders an opportunity to comment;⁶

¹ 47 C.F.R. § 1.429(g)

² <https://docs.fcc.gov/public/attachments/DA-18-893A1.pdf>.

³ See *generally* Petition for Clarification or, in the Alternative, Reconsideration of Sprint, CG Docket Nos. 13-24 and 03-123 (July 9, 2018) (“*Sprint PFCR*”).

⁴ Ex Parte of Consumer Groups, CG Docket Nos. 13-24, 03-123 (“*Application Framework Ex Parte*”), <https://www.fcc.gov/ecfs/filing/107271021711657>. We again take no position on Sprint’s arguments on the appropriate approach to setting rates. See *Sprint PCFR* at 13-14; *Application Framework Ex Parte* at 2, n.2.

⁵ See *generally* Comments of Hamilton Relay, Inc. CG Docket Nos. 13-24, 03-123 (Sept. 7, 2018); Comments of CaptionCall, LLC, CG Docket Nos. 13-24, 03-123 (Sept. 7, 2018).

⁶ See Hamilton Comments at 8-13.

- The Commission should articulate and adopt a technology-neutral framework for certifying IP CTS providers that seeks notice and comment and ensures the quality, privacy, and reliability of new offerings.⁷
- The Commission should afford the opportunity for consumers to comment on all IP CTS certification applications.⁸

Conversely, the Commission should reject the narrow opposing arguments raised against Sprint's petition. MachineGenius argues against Sprint's petition primarily on the basis that there the Commission's minimum standards do not require robust demonstrations of privacy, emergency capabilities, reliability, or accuracy for non-ASR offerings, and so ASR offerings should likewise pass with little scrutiny from the Commission.⁹ T-Meeting likewise argues that "[e]xisting IP CTS providers may or may not establish accuracy," and that consumers who do not "find the ASR speed and accuracy acceptable" can simply "abandon the service."¹⁰

To whatever extent non-ASR offerings are deficient, the Commission should adopt technology-neutral requirements that *all* IP CTS services can satisfy robust standards of functional equivalency. The Commission should decline the invitation to certify new providers solely on the grounds that they are *no less problematic* for consumers than existing offerings that fail to serve their needs or that consumers can simply stop communicating with their friends, family, and coworkers if the no market for high-quality services exists.

⁷ Cf. CaptionCall Comments at 2-12.

⁸ Cf. *id.* at 4.

⁹ E.g., Opposition of MachineGenius, Inc. CG Docket Nos. 13-24, 03-123, at 3 ("The role of the minimum mandatory standards is not to prescribe methods for determining compliance with the Rules; it is not clear why detailed methodologies should apply only to providers based on fully-automated ASR; current providers are not subject to such methodologies."), 4 ("[C]urrent IP CTS are no less susceptible to cyber-attack, bandwidth disruptions, or platform upgrades [than ASR offerings]") (Sept. 7, 2018).

¹⁰ Comment of T-Meeting Global AB, CG Docket Nos. 13-24, 03-123, at 1 (Aug. 30, 2018).

Certificate of Service

Pursuant to Rule 1.47(d) and 1.49(f) and (g), I certify that on this day, September 17, 2018, I caused a true and correct copy of the foregoing reply comments and the referenced attachment to be served upon:

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