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November 17, 2017

Marlene H. Dortch, Secretary
Office of the Secretary
Federal Communications Commission
445 12th Street, S.W., Rm TW-A325
Washington, DC 20554

Re: *Ex Parte* Letter: Misuse of Internet Protocol Captioned Telephone Service (IP CTS) and Speech-to-Speech for Individuals with Hearing and Speech Disabilities, CG Docket Numbers 13-24, 03-123.

Dear Ms. Dortch:

RAZ Mobility, LLC (“RAZ”) provides mobile assistive technology to State equipment distribution programs. Equipment includes smartphones and tablets pre-loaded with applications that can assist people with disabilities. RAZ also provides training and support for the equipment, as well as mobile device management services.

RAZ will soon include an application on all of its Android smartphones and tablets that will allow individuals who are deaf or hard of hearing to communicate in real time using Automatic Speech Recognition (ASR). Both parties to the conversation must have the application installed on their Android devices. The application is the first of its kind and breaks new ground in the effort to reduce the cost of relay service.

The app will be made available for free (both to install and use) to state equipment distribution programs (“EDPs”) that purchase RAZ equipment. Friends and family who wish to communicate with their deaf or hard of hearing loved one will be able to download the application from the Play Store for a very modest annual fee.

The introduction of this application has the potential to save the Telecommunications Relay Service fund, state relay funds and ultimately rate payers, considerable money. Consider: every minute that consumers use the application will save approximately \$2.00 in relay expense. If a consumer uses the app for only 50 minutes per month over three years, the savings would amount to approximately \$3,600 (\$2.00/min X 50 min/month X 36 months).

In a letter filed by the Telecommunications Equipment Distribution Association (“TEDPA”) on October 2, 2017, TEDPA stated that, “[d]uring TEDPA's annual business meeting on Wednesday, September 13, 2017, the members unanimously agreed to move forward and work with the FCC regarding options for certification/evaluation processes for individuals requesting IP-CTS equipment that could work in their respective states.” It further provided that, “TEDPA believes that many individuals that currently use the IP-CTS service may benefit from

alternative technologies such as an amplified telephone. Most state EDPs currently offer alternative technologies as part of their program services.” RAZ believes that mobile apps that use ASR should be considered an alternative technology that state EDPs should encourage consumers to use when consumers go through the evaluation process. If state EDPs do not educate consumers regarding the availability of ASR solutions and encourage their use, ASR apps will not be adopted in significant numbers.

Further, RAZ notes that fewer than half of all states offer mobile devices as part of their equipment distribution programs. States that do not have such programs should be encouraged to adopt them. While data is not available, reason suggests that individuals who use mobile devices are less reliant on IP CTS. Individuals with mobile devices are likely communicate through additional channels, such as email, messaging, social media and video calls. As my brother recently told me when he was slow to return one of my calls, “calling is so 2010.” And shortly consumers with mobile devices will be able to use apps that employ ASR.

Supporting the use of mobile devices by people with disabilities also furthers additional important Commission and state objectives such as narrowing the digital divide and providing consumers a means of participating in telehealth, which is particularly important in rural states.

RAZ thanks the Commission for its serious consideration of ASR-based solutions.

Sincerely,

Robert Felgar, CEO

cc: Karen Peltz Strauss
Eliot Greenwald
Michael Scott