



June 21, 2018

VIA HAND DELIVERY AND ELECTRONIC MAIL

Suzanne Singleton
Chief
Disability Rights Office
Consumer and Governmental Affairs Bureau
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Received-FCC

JUN 21 2018

Bureau / Office

RE: ClearCaptions, LLC – Request For Waiver Of 47 C.F.R. §68.317(f) Of The Commission's Rules

Dear Ms. Singleton:

ClearCaptions, LLC ("ClearCaptions" or "Company"), a provider of Internet Protocol Captioned Telephone Services (IP CTS), hereby requests a waiver of the requirements of 47 C.F.R. §68.317(f) of the Commission's rules pursuant to the Commission's streamlined waiver procedures ("Request").¹ The Company seeks the waiver for its ClearCaptions Blue telephone devices ("Blue") that include a volume control override switch so that persons with hearing disabilities can use the telephone without having to turn the volume back up each time.

In accordance with the Commission's streamlined procedures, ClearCaptions hereby certifies that the Blue devices comply with the following conditions:

- (1) the volume reset override switch shall be labeled as such and shall be located on the telephone in such a way as not to be accessible to accidental engagement;
- (2) a bright indicator light shall be prominently displayed on the front of the telephone and lights up when the override is engaged and the telephone is placed in an off-hook condition;
- (3) next to the light there shall be a warning that the amplification is at a high level;
- (4) a caution on the use of the volume reset override switch shall be included in the users' manual; and

¹ See *Sorenson Communications, Inc. and CaptionCall, LLC, Request For Waiver Of Volume Control Reset*, 47 C.F.R. §68.6317(f), 29 FCC Rcd 14879 (Disability Rights Office, 2014), citing *Tandy Corporation, Walker Equipment Company, Ameriphone, Inc., and Ultratec, Inc., Request for Waiver of Volume Control Reset*, 47 C.F.R. § 68.317(f), NSD-L-00-17, NSD-L-00-22, NSD-L-00-63, NSD-L-00-193, DA 01-578, 16 FCC Rcd 5253 (Com. Car. Bur. 2001) .



(5) the telephone shall include a warning printed in Braille that can be securely attached to the back of the handset, or, if the telephone has only a headset, above the dial buttons, to indicate that a high volume setting may be engaged.

The undersigned representative of ClearCaptions is responsible for the truthfulness of this Request and hereby certifies that the foregoing representations concerning the equipment are true and correct.

If there are any questions on this Request, please contact the undersigned.

Respectfully submitted,

ClearCaptions, LLC

Mike Strecker / by PMB.

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