

Before the
Federal Communications Commission
Washington, DC

In the Matter of:

911 Access, Routing, and Location)
in Enterprise Communications) PS Docket 17-239
System)

Reply Comments of

Telecommunications for the Deaf and Hard of Hearing, Inc. (TDI)
National Association of the Deaf (NAD)
Hearing Loss Association of America (HLAA)
Association of Late-Deafened Adults (ALDA)
California Coalition of Agencies Serving the
Deaf and Hard of Hearing (CCASDHH)
Cerebral Palsy and Deaf Organization (CPADO)
Deaf and Hard of Hearing Consumer Advocacy Network (DHHCAN)
Deaf/Hard of Hearing Technology Rehabilitation Engineering Research Center
(DHH-RERC)

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Discussion

Telecommunications for the Deaf and Hard of Hearing, Inc. (TDI), the National Association of the Deaf (NAD), the Hearing Loss Association of America (HLAA), the Association of Late-Deafened Adults (ALDA), the Cerebral Palsy and Deaf Organization (CPADO), the California Coalition of Agencies Serving the Deaf and Hard of Hearing (CCASDHH), and the Deaf and Hard of Hearing Consumer Advocacy Network (DHHCAN), collectively, “Consumer Groups,” and the Deaf/Hard of Hearing Technology Rehabilitation Engineering Research Center (DHH-RERC) respectfully reply to initial comments on the Commission’s September 26, 2017 Notice of Inquiry in the above-referenced docket (NOI).¹ The NOI specifically sought comment on the accessibility dimensions of 911 in the context of enterprise communications systems (ECS).²

Consumer Groups seek to promote equal access for the 48 million Americans who are deaf, hard of hearing, late-deafened, or DeafBlind to life-saving access to the 911 system. As an advocate for technology and telecommunications policy that advances the public interest, DHH-RERC strongly supports the Consumer Groups’ goal of ensuring that the 911 system is fully accessible to all Americans—including those with disabilities.

The record developed in response to the NOI strongly underscores the importance of Commission action to ensure that ECS support accessible 911 for people who are deaf or hard of hearing. For example, the California Public Utilities Commission noted that “TTY and [captioned telephone] users are a statistically vulnerable population, who might be

¹ 32 FCC Rcd. 7923, https://apps.fcc.gov/edocs_public/attachmatch/FCC-17-125A1_Rcd.pdf.

² *See id.* at 7932, ¶ 27.

calling from a residence or enterprise environment such as assisted living, hospitals or business.”³

The record also indicates that making ECS accessible through the provision of Real-Time Text (RTT) and Video Relay Service (VRS) is achievable in the near future. For example, NENA notes that “soon, [911 Public Safety Answering Points (PSAPs)] will also handle both interim- and next-generation-native Real-Time Text.”⁴ Moreover, PSAPs that are not yet equipped to handle RTT calls are in a position to receive RTT communications as TTY calls through the use of gateways, as outlined in the FCC Emergency Access Advisory Committee’s Report on the TTY transition and the corresponding NENA STA-010 specifications for NG 911.⁵

However, it remains unclear the extent to which ECS systems provide equal access to 911 facilities, especially when it comes to the provision of location information. The Colorado Public Utilities Commission notes that some ECS systems “d[o] not take advantage of existing technology to provide location information” and as a result “pu[t] deaf, deaf-blind, hard of hearing, and speech impaired callers at a disadvantage when using ECS to call 9-1-1, a violation of the spirit of the [Americans with Disabilities Act].”⁶ Similarly, Comtech notes that “[b]ecause of RTT’s use by the deaf and hearing/speech impaired

³ Comments of California Public Utilities Commission at 7 (Nov. 16, 2017), <https://ecfsapi.fcc.gov/file/11150090912367/PS%20Docket%20No%2017-239%20Comments%20to%20E911%20NOI.pdf>.

⁴ Comments of National Emergency Number Association at 3 (Nov. 16, 2017) (NENA Comments), <https://ecfsapi.fcc.gov/file/1116205672890/2017%20MLTS%20NOI%20Comments.pdf>.

⁵ EAAC TTY Transition Group, Draft Report at 15 (Sep. 14, 2012), <https://www.fcc.gov/document/eaac-tty-transition>.

⁶ Comments of Colorado Public Utilities Commission at 6-7 (Nov. 13, 2017), <https://ecfsapi.fcc.gov/file/1113184553096/Enterprise%20911%20Comments.pdf>.

communities, it is crucial that ECS systems provide a civic form of location for emergency calls made indoors.”⁷

It also remains unclear the extent to which PSAPs remain capable of receiving RTT or VRS calls from ECS systems.⁸ This is not primarily a PSAP issue, but an issue of ECS interconnecting RTT capabilities to ESINet and TTYs for legacy PSAPs. ECS and their VoIP providers need to acquire RTT capabilities first. Likewise, for VRS calls, the most important step is to connect ECS to VRS providers in the short term, followed by direct video to NG 911 in the long term.

This proceeding is a critical opportunity for the Commission to carry out its mandate of promoting safety of life and property by ensuring easy access to 911 services.

Telecommunications Industry Association (TIA) emphasizes a willingness to engage with the “roundtable discussion with appropriate stakeholders” recommended by the FCC’s Disability Advisory Committee and an interest in “further discussion regarding ECS accessibility requirements.”⁹ We agree and urge the Commission to take further steps to facilitate that dialogue and stand ready to collaborate with the Commission and our colleagues from industry and the public safety community to ensure equal access to the 911 system.

⁷ Comments of Comtech Telecommunications Corp. at 5 (Nov. 16, 2017), <https://ecfsapi.fcc.gov/file/1116220126676/Comtech%20Comments%20Final%20Signed%20Copy%2011-15-17.pdf>.

⁸ *See* NENA Comments at 3.

⁹ Comments of TIA at 5 (Nov. 15, 2017), <https://www.fcc.gov/ecfs/filing/1116075152954>

Respectfully submitted,

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