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December 19, 2018

VIA ELECTRONIC FILING (ECFS)

Marlene H. Dortch, Esq.  
Secretary  
Federal Communications Commission  
445 Twelfth Street, SW  
Washington, DC 20554

RE: **EX PARTE PRESENTATION**  
*Transition from TTY to Real-Time Text Technology*  
CG Docket No. 16-145

*Petition for Rulemaking to Update the Commission's Rules for Access to Support  
the Transition from TTY to Real-Time Text Technology, and Petition for Waiver  
of Rules Requiring Support of TTY Technology*  
GN Docket No. 15-178

Dear Ms. Dortch:

On December 17, 2018, Dixie Ziegler, John Nelson (by telephone), and Jeff Knighton of Hamilton Relay, Inc. ("Hamilton"), and David O'Connor (by telephone) and Rachel Wolkowitz of Wilkinson Barker Knauer, LLP on behalf of Hamilton, met with Karen Peltz Strauss, Suzanne Rosen Singleton, Eliot Greenwald, Robert Aldrich, and Michael Scott of the Consumer and Governmental Affairs Bureau concerning the above-captioned proceedings.<sup>1</sup>

During the meeting, Hamilton noted that, as a provider of Telecommunications Relay Services ("TRS"), including TTY services, it has embraced Real-Time Text ("RTT") technology for years, and continues to be ready and able to receive *native* RTT calls to its TRS centers from wireless carriers. Hamilton also noted that although traditional calls to 711 are treated like any other 800-number call, RTT/TRS calls present different challenges that are taking time to work through. Hamilton representatives and FCC staff observed that although some of the interconnection issues will be resolved once the entire PSTN has shifted to all-IP, the interim solutions during the current transition period have not developed as hoped and that the default approach has been to rely on backwards compatibility rather than native RTT handoff. This approach means that TTY users have not been able to avail themselves of the full range of RTT

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<sup>1</sup> *Transition from TTY to Real-Time Text Technology; Petition For Rulemaking To Update The Commission's Rules For Access To Support The Transition From TTY To Real-Time Text Technology, And Petition For Waiver Of Rules Requiring Support Of TTY Technology*, Report and Order and Further Notice of Proposed Rulemaking, 31 FCC Rcd 13,568 (2016).

features, which would be available to them if native RTT approaches are implemented through relay.

Hamilton also explained that the public's awareness of RTT and new TTY technology – such as TTY on iPhones – is increasing. Specifically, Hamilton is receiving more questions both to its customer service and during external outreach events about these new technologies, and Hamilton is revising its own relay procedures to account for the new functionalities that RTT enables. Finally, Hamilton presented an off-the-shelf wireline phone that, with Hamilton's technology, could make RTT calls using an external keyboard. Hamilton is working with the state of California on a potential trial of wireline RTT service.

In addition, Hamilton requested that the Commission clarify that RTT-enabled TRS providers should be treated similarly to RTT-enabled public safety answering points ("PSAPs").<sup>2</sup> With respect to PSAPs, the Commission stated:

So long as a PSAP has taken the necessary measures to support RTT, the record does not contain any justification for delaying the corresponding obligation of wireless carriers to transport RTT communications to that PSAP. In the event that there are compelling reasons why this would not be feasible, a service provider may apply for a waiver from this requirement.<sup>3</sup>

The public interest rationale for this approach applies equally to individuals who are deaf or hard of hearing, and who rely on TRS Providers for critical communications. Without this clarification, such users would be precluded from receiving the full benefits of this modern technology.

This filing is made in accordance with Section 1.1206(b)(1) of the Commission's rules, 47 C.F.R. § 1.1206(b)(1). In the event that there are any questions concerning this matter, please contact the undersigned.

Respectfully submitted,

/s/ Dixie Ziegler  
Vice President  
Hamilton Relay, Inc.

cc (via email): Karen Peltz Strauss  
Suzy Rosen Singleton  
Eliot Greenwald  
Michael Scott  
Robert Aldrich

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<sup>2</sup> *Id.* ¶ 45 ("We . . . require that once a PSAP is [RTT] capable, the requested service provider must begin delivering RTT communications in an RTT format within six months after such request is made – to the extent the provider has selected RTT as it[s] accessible text communication method.").

<sup>3</sup> *Id.*