



Federal Communications Commission
Washington, D.C. 20554
December 21, 2020

VIA EMAIL

Ms. Cindy D. McCarty
In-House Counsel
East Kentucky Network d/b/a Appalachian Wireless
101 Technology Trail
Ivel, Kentucky 41642
Email: cmccarty@ekn.com

Re: Petition of Appalachian Wireless for Temporary Waiver of the TTY/RTT Transition Rules, CG Docket No. 16-145 and GN Docket No. 15-178

Dear Ms. McCarty:

The Consumer and Governmental Affairs Bureau (Bureau), in order to complete its review of your request for a waiver extension in the above-captioned proceeding, requests the following information.

1. Describe the IP-based voice services (e.g., VoLTE, VoWi-Fi, etc.) that the Company offers.
2. In what geographic areas are the Company's IP-based voice calling services currently available, and to how many subscribers?
3. When did the Company first make IP-based voice calling services available for customers?
 - a. Provide a copy of any notice that the Company provided to consumers regarding the availability and limitations of IP-based voice calling services.
4. Are the Company's legacy networks (e.g., 2G, 3G, TDMA, GSM, CDMA, iDEN, etc.) still in use?
 - a. If no, when were the legacy networks retired in each geographic area served by the Company?
 - b. If yes, describe what services are available on the legacy networks and whether and how customers know which network they are using.
 - c. Does the Company have plans to retire any existing legacy networks? If yes, what is that schedule?
 - d. Has the Company notified customers of the schedule for retirement of the legacy networks? If yes, provide a copy of the notice.
5. Does the Company currently support TTY calling?
 - a. Identify the geographic areas where TTY calling is supported and any limitations on such support.
 - b. What has the Company done to evaluate the effectiveness of TTY calls on its networks?
 - c. To the extent that the Company currently supports TTY calls, explain how customers know TTY is an available option. Provide copies of any notices to customers regarding TTY calling.
 - d. To the extent that the Company currently supports TTY calling, describe how a TTY call would be routed in areas where the primary network is IP-based. If TTY 911 calls are routed differently from other TTY calls, describe the difference.

- e. Provide copies of any notices to customers regarding TTY calling, including any notices re 911 calling that address the use of TTYs.
6. Has the Company entered into a contract with a network vendor to deploy RTT, as defined by Part 67 of the Commission's rules?
 - a. If yes, identify the vendor, the date of the contract, and the projected RTT-ready date(s) specified in the contract and in any subsequent contract amendments. Provide documentation supporting your response.
 - b. If yes, describe the progress toward RTT deployment in the Company's network, and provide both the vendor's and the Company's project status reports. Detail what elements of your network require modification to implement RTT and projected dates for completing each of those modifications.
 - c. If the Company has not contracted with a network vendor for deployment of RTT, explain in detail why not. Describe the Company's plans and anticipated timeline for support of RTT, including its plan and timeline for negotiations with a network vendor. Explain what elements of your network will need modification to implement RTT.
 - d. As the Company expands IP-based voice services into newer coverage regions, state whether RTT service will be made available in those areas at the same time. If not, explain why this is not possible as well as any additional network modifications needed to support RTT in those areas along with timeline of RTT implementation.
7. Describe any obstacles or events that have affected the Company's efforts to deploy RTT, including when they occurred, and what the impact was of each obstacle or event. Provide any relevant documents supporting your response.
8. Has the Company entered into a contract with a vendor for 911 routing and delivery of RTT calls to PSAPs?
 - a. If yes, identify the vendor, the date of the contract, and the projected RTT-to-911 ready date(s) specified in the contract and in any subsequent contract amendments. Provide documentation supporting your response.
 - b. If yes, describe the Company's progress toward handling and delivering 911 calls over RTT, and provide the vendor's and the Company's project status reports. Detail what network elements require modification to accommodate the RTT-to-911 solution.
 - c. If the Company has not contracted with a 911-to-RTT vendor, explain in detail why not. Describe the Company's plans and timeline for implementing support of 911 calls over RTT, including its plan and timeline for negotiations with a network vendor. Explain what network elements will require modification to accommodate the RTT-to-911 solution.
 - d. Do you have a plan for testing RTT delivery with PSAPs?
 - e. Have any PSAPs notified the Company that they are RTT-ready, and if so, when did they provide such notification? Provide copies of any correspondence.
9. Has the Company arranged for acquisition of at least one RTT-enabled mobile device from a device manufacturer?
 - a. If yes, identify the Company's equipment vendor(s), the date(s) of its agreement(s), and the projected delivery date(s) specified in the contract and any subsequent contract amendments. Provide documentation supporting your response.

- b. If yes, describe the progress toward enabling RTT in mobile devices on the Company's network. Detail what device or network elements, if any, require modification to ensure the device can be used for RTT communications.
 - c. If the Company has not engaged a device manufacturer for delivery of RTT-enabled mobile devices, explain why not, and how the Company plans to support RTT-enabled devices in its initial implementation of RTT, and its timeline for completion of such plans through the date such devices will be made available to customers.
 - i. Are there software applications or updates that can be downloaded by customers or pushed over-the-air to customers to make the current mobile devices RTT-enabled?
 - ii. Alternatively, provide the Company's timeline to engage at least one equipment vendor to deliver RTT-enabled mobile devices, any requests for proposals, and correspondence. What is the Company's plan for acquiring RTT-enabled mobile devices and its anticipated timeline for delivery of RTT-enabled mobile devices?
 - iii. Under either alternative (i) or (ii), describe what device and network modifications are needed to make devices capable of mobile-to-mobile RTT and mobile-to-PSAP RTT communications.
 - d. According to the timelines set forth in the Commission's Report and Order on RTT, by June 30, 2021, non-Tier I service providers (including resellers) that opt to support RTT must do so for *all new authorized user devices* activated on their networks. FCC 16-169, para. 67. Does the Company expect to meet this deadline? If not, what is the Company's plan and proposed timeline for completing this second phase of RTT implementation?
10. The conditions of the CCA waiver granted in April 2016 required that participants provide notice to customers that TTY is not operable on IP-based networks and to recommend alternatives for persons with hearing and speech disabilities.
 - a. Describe how the Company complied with this condition, including where and in what formats it provided this notice, including hyperlinks to webpages and copies of paper formats.
 - b. When did the Company initially make this notice available to customers?
 - c. What is the current status of this notice?
11. Have any customers contacted the Company, complained to the Company, or both, regarding their ability to use a TTY with the Company's service since it began offering IP-based voice calling services, and if so, when did each of these customers contact the Company and how did it respond? Provide copies of any correspondence.
12. Have any customers contacted the Company, complained to the Company, or both, regarding the availability of RTT since it began offering IP-based voice calling services, and, if so, when did each of these customers contact the Company and how did it respond? Provide copies of any correspondence.
13. The conditions of the CCA waiver granted in April 2016 required that participants provide semi-annual progress reports on deploying RTT. CCA's last RTT progress report before the filing of the petition was submitted April 17, 2020.
 - a. As of April 17, 2020, what was the status of RTT deployment on the Company's network?
 - b. Describe any events or obstacles that impeded the Company's progress toward RTT deployment between April 17 and June 30, 2020.

December 21, 2020

Page 4

- c. Describe any events or obstacles encountered prior to April 17, 2020, that contributed to the Company's inability to meet the June 30, 2020 deadline, and if there were any such events or obstacles, why they were not reported in any of the progress reports.
 - d. Provide any documentation that supports the responses to this question.
14. If the Company wishes to provide other information or relevant documentation regarding its deployment of RTT, please provide it here.

Please submit your response in CG Docket No. 16-145 and GN Docket No. 15-178 within 30 days of the date of this letter.

Sincerely,

Suzy Rosen Singleton
Chief, Disability Rights Office

cc: Robert Koppel
Via Email: bkoppel@fcclaw.com