



Federal Communications Commission

Washington, D.C. 20554

December 21, 2020

**VIA EMAIL**

Monica K. Akin, General Counsel  
Viaero Wireless  
1224 West Platte Ave.  
Fort Morgan, CO 80701  
Email: [Monica.Akin@viaero.com](mailto:Monica.Akin@viaero.com)

Re: Petition of Certain Members of CCA for Waiver or, In the Alternative, Declaratory Ruling, CG Docket No. 16-145 and GN Docket No. 15-178

Dear Ms. Akin:

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.



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- 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: Julie Veach

Via Email: [jveach@hwglaw.com](mailto:jveach@hwglaw.com)

Alexi Maltas

Via Email: [amaltas@ccamobile.com](mailto:amaltas@ccamobile.com)