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May 18, 1998



**Building The
Wireless Future™**

Ms. Magalie Salas
Secretary
Federal Communications Commission
1919 M Street, NW, Room 222
Washington, DC 20554

RECEIVED

CTIA

MAY 18 1998

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Cellular
Telecommunications
Industry Association
1250 Connecticut
Avenue, N.W.
Suite 200
Washington, D.C. 20036
202-785-0081 Telephone
202-785-8203 Fax
202-736-3215 Direct Dial

**Re: Ex Parte Presentation
CC Docket No. 94-102
E9-1-1/TTY Compatibility**

Andrea D. Williams
Assistant General
Counsel

Dear Ms. Salas:

On Monday, April 18, 1998, the Cellular Telecommunications Industry Association ("CTIA") represented by Andrea Williams, Assistant General Counsel, the Personal Communications Industry Association ("PCIA") represented by Mary Madigan, and Telecommunications for the Deaf, Inc. ("TDI") represented by Claude Stout, met with Mr. Dan Phythyon, Chief of the Wireless Telecommunications Bureau and his staff regarding the above-referenced proceeding. Attached is a list of the FCC staff who attended the meeting.

At the meeting, the parties discussed the Wireless TTY Forum Quarterly Status Report, the progress of the Wireless TTY Forum, and the need for FCC guidance on VCO/HCO access to 9-1-1 over digital wireless systems. Although members of the TTY Forum have different interpretations as to whether the FCC's E9-1-1 rules require VCO/HCO access to 9-1-1 over digital wireless systems, it is the consensus of the TTY Forum that Working Group #2 will examine VCO/HCO issues under long-term solutions. CTIA, PCIA and TDI asked if the FCC could provide guidance on this issue so that a determination can be made whether HCO/VCO access is a long-term or short-term solution for TTY users to access 9-1-1 over digital wireless systems.

Mr. Phythyon stated that in his view if carriers cannot provide HCO/VCO access to 9-1-1 over digital wireless systems by the October 1, 1998, compliance date, the parties should submit such information in writing. The document should include a notification process whereby carriers will notify their subscribers in a timely manner that they cannot use HCO/VCO to access 9-1-1 over digital wireless systems. Mr. Phythyon also explained that the Commission would expect the parties to provide a timetable as to when HCO/VCO access to 9-1-1 over digital wireless systems could be achieved from a technical standpoint. The staff also requested information on whether the PSAP community have the technical capability to accept HCO/VCO calls; whether analog phones can provide HCO/VCO access to 9-1-1; and any data available on current users and anticipated demand of HCO/VCO services.

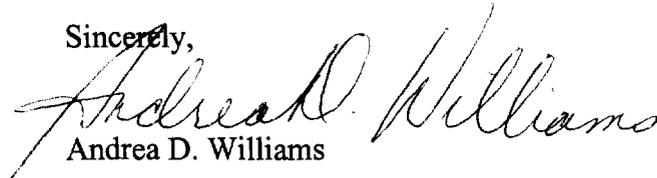
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CTIA provided the attached information concerning the upcoming TTY Forum Meeting on May 20-21, 1998 and a letter to several manufacturers concerning the timely completion of assigned testing and tasks.

Pursuant to Section 1.1206 of the Commission's Rules, an original and one copy of this letter and its attachments are being filed with your office. If you have any questions, concerning this submission, please contact the undersigned.

Sincerely,

A handwritten signature in cursive script that reads "Andrea D. Williams". The signature is written in dark ink and is positioned to the right of the typed name.

Andrea D. Williams

Attachments (3)

FCC STAFF IN ATTENDANCE

Wireless Telecommunications Bureau

Dan Phythyon, Chief

John Cimko, Chief, Policy Division

Nancy Boocker, Deputy Chief, Policy Division

Elizabeth Lyle, Senior Legal Advisor to Bureau Chief

Josh Roland, Legal Advisor to Bureau Chief

Ron Netro, Senior Engineer, Policy Division

Disabilities Issues Task Force

Meryl Icove, Director

The attached letter was also sent to:

Mr. Jim Carpenter
Senior Vice President
NEC America, Inc.
8 Corporate Center Drive
Melville, NY 11747

Mr. Jim Delouch
Philips Consumer Communications
45700 Northport Loop East
Fremont, CA 94538

Mr. Bo Hedfors
President & CEO
Ericsson Inc.
740 East Campbell
Richardson, TX 75081

Mr. Matthew J. Desch
President, Wireless Networks
Northern Telecom Inc.
2221 Lakeside Blvd.
Mail Stop C1618
Richardson, TX 75082

Mr. Kevin Kelley
Sr. V.P. of External Affairs
QUALCOMM, Inc.
1233 20th Street, NW
Suite 202
Washington, DC 20036

Mr. Jon Heller
Sony Electronics, Inc.
Mail Zone 7310
16450 West Bernardo Drive
San Diego, CA 92127

Mr. Michael Palacios
Product Manager
Siemens Wireless Terminals
2220 Caramel Creek Blvd.
Richardson, TX 75082

Mr. Yoke P. Kung
V.P. General Manager Advanced
Wireless Division
UNIDEN San Diego
5808 Pacific Center Blvd.
San Diego, CA 92121

Ms. Robin Fry
Niigata Seimitsu
Modus Operandi, Inc.
308 Lakeland Drive
Highland Village, TX 75067

Mr. Jim Scordato
Mitsubishi Wireless
2001 Cherry Drive
PO Box 299
Braselton, GA 30517

Mr. Robert L. Toler
V.P. & general Manager
Panasonic Corporation
1225 Northbrook Parkway
Suite 2-366
Suwanee, GA 30174

Mr. Moshe Sheps
Globewave, Inc.
218 Route 17 North, Suite 202
Rochelle Parl, NJ 07662

Mr. K-P Wilska
President
Nokia Mobile Phones, America
6000 Connection Drive
Irving, TX 75039

Mr. Frank Wapole
V.P. & General Manager
Motorola, Inc. Pan American Cellular
Subscriber Sector
600 North U.S. Highway 45
Libertyville, IL 60048

WIRELESS E911 TTY FORUM
CTIA and PCIA

April 27, 1998

Mr. James Barnett
AUDIOVOX Communications Corporation
555 Wireless Blvd.
Hauppauge, NY 11788

Dear Mr. Barnett;

The Federal Communications Commission ("FCC") has adopted rules requiring wireless carriers to ensure that TTY users can access 9-1-1 services over wireless telecommunications systems ("TTY/E9-1-1 compatibility requirement"). Given the technical challenges associated with supporting TTY signaling over digital wireless systems, the FCC has granted an extension of time until October 1, 1998, for digital wireless systems only, to comply with the FCC's TTY/E9-1-1 compatibility requirement. The FCC has also noted that phone manufacturers have a separate obligation to make digital wireless phones accessible to TTY users under Section 255 of the Telecommunications Act of 1996.

CTIA and PCIA have co-chaired several meetings of the Wireless E9-1-1/TTY Forum ("TTY Forum"). The purpose of the TTY Forum is to seek and develop technical solutions to support TTY technology over digital wireless systems. The TTY Forum includes representatives from the four interest groups that have a significant stake in providing TTY users access to 9-1-1 over digital wireless systems: wireless telecommunications industry (wireless carriers and phone manufacturers), manufacturers of TTY equipment, emergency and relay service providers (9-1-1 and TRS), and consumer organizations that represent individuals who are deaf and hard of hearing ("Stakeholders").

The TTY Forum has developed an objective test procedure that is designed to evaluate the "through-put" error rate of 45.45 baud Baudot TTY devices over wireless telephone links. The objective of this *Through-put Test* is to provide manufacturers with a standard test that will provide a reliable measure of error rate in transmission over a digital air interface. The TTY Forum reached a consensus at the February 1998 Forum Meeting that phone manufacturers would use the Throughput Test to benchmark TTY signal performance over digital capabilities in order to determine the success rate for transport, and report test results at the April 1998 Forum Meeting.

At the April 1-2, 1998 meeting, members of the TTY Forum were alarmed to learn that phone manufacturers had not progressed as expected in completing the testing. It is imperative that assigned testing and tasks are completed in a timely manner in order to provide a technical solution by the October 1, 1998, compliance date. The wireless industry will be unable to meet that deadline without the full cooperation of all the Stakeholders. Furthermore, the TTY Forum

must demonstrate in the mandatory quarterly status report to the FCC that progress is being made, and the TTY Forum must identify potential problems as early as possible. With only six months left to implement a technical solution, delays only hamper the Forum's progress.

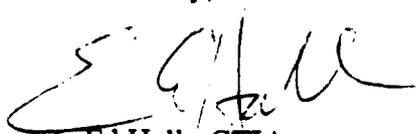
Enclosed is a copy of the Through-put Test approved by the TTY Forum for your use. Please conduct the test as soon as possible so that your company can provide test results at the next TTY Forum Meeting (May 20-21). We are also attaching a copy of a *Test Matrix* that will be used to track the progress of all relevant parties. This test matrix will be included in the quarterly status reports to the FCC. Following your test period(s) please complete the attached matrix and return it to Ed Hall and Mary Madigan prior to the May 1998 TTY Forum Meeting.

Under development by the TTY Forum is an *End-User Test*. Upon successful completion of the phone manufacturers' tests, Gallaudet University has agreed to conduct limited field trials, using the End-User Test with a local PSAP. The field trials are to verify that laboratory throughput results bear a strong relationship to error rates in field conditions. The TTY Forum has agreed that TTY and wireless phone manufacturers will provide equipment support for the field testing, and carriers will support the phones used in the field trials. Please be prepared to provide Judy Harkins at Gallaudet University with your handsets that have been successfully tested along with associated connector cables. Judy can be reached at (202) 651-5257 to make arrangements for shipment of the phones.

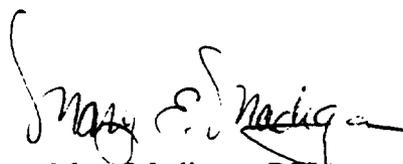
A standards requirements document ("SRD") for a connector cable between a handset and a TTY device is currently being developed. It is anticipated that your review and comments to this SRD will provide modifications needed to accommodate your equipment. It is expected that upon review and approval by manufacturers that this SRD will be submitted to the relevant standards organization(s).

The next meeting of the Wireless E9-1-1/TTY Forum is May 20-21, in Washington, D.C. We hope that your company will be able to report progress in this area. In the event you have any questions, please feel free to call Ed Hall, CTIA, or Mary Madigan, PCIA.

Sincerely,



Ed Hall, CTIA
Co-chair
Wireless E9-1-1/TTY Forum
1250 Connecticut Ave N.W.
Suite 200
Washington, DC 20036
202/736-3259 ehall@ctia.ord



Mary Madigan, PCIA
Co-chair
Wireless E9-1-1/TTY Forum
500 Montgomery Street
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TTY/TDD FORUM - 5

Washington, DC

May 20 - 21, 1998

12:30 - 5:00 Day 1

9:00 - 5:00 Day 2

AGENDA

1. Call to Order & Opening Remarks Co-Chairs, CTIA/PCIA
2. Introductions and Attendance Roster
3. Call for and Numbering of Contributions
4. Review & Approve Agenda
5. Review & Approve TTY Forum - 4 Summary
6. Review TTY Forum *Agreements*
7. Review TTY Forum Correspondence
8. TTY Liaison Reports Updates: *FCC; CTIA; NAD; TDI* Appropriate Reps
9. Anti - Trust Comments Mike Altschul
10. New Agreement Statements RE: *Carrier and
Manufacturer Responsibilities as of 10/1/98*
11. Analog Phones and Devices
 - Presentations- Lober and Walsh Engineering Joshua Lober
Sendele Wireless Solutions Inc. Steve Sendele
 - Analog Phone / TTY Devices List CTIA
12. Working Group Reports
 - Working Group #1/3: TTY over Voice Services Wesley Howe
and Coupling. Doug Neeley, Chairs
 - Through Put Testing
 - Update Matrix
 - Review Draft SRD - 2.5mm jack
 - Working Group #2: TTY via Data Services Brye Bonner, Chair
 - Presentation - Motorola
 - Presentation - DSPG Ltd. George Skorkowski
 - Review Draft SRD - V.18

13. Discuss and Define *End User Test*
14. Identify possible work effort regarding interference
between phones and TTY devices.
15. Review Consumer Requirements Document
16. SEC 255 NPRM
17. New Business/Next Steps.
18. Next Meeting
19. Adjournment

Toni Dunne/Judy Harkin

Karen Peltz-Strauss