



CTIA

Cellular Telecommunications Industry Association

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September 8, 1998

SEP 16 1998

FEDERAL COMMUNICATIONS COMMISSION
SECRETARY

Mr. Ed Hall
Ms. Mary Madigan
Co-Chairs, Wireless TTY Forum
c/o Gallaudet University
Kellogg Conference Center
800 Florida Avenue, NE
Washington, DC 20001

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Dear Members of the Wireless TTY Forum:

At Wireless TTY Forum 6,¹ consumer advocacy groups representing the deaf and hard of hearing submitted a document titled "Consumer Approved Criteria for Acceptance of 'One Phone Model Per Service Provider as of October 1' Proposal" ("Consumer Criteria Document").² The purpose of the document is to stimulate discussion and solicit the views of the wireless telecommunications service providers and equipment manufacturers participating in the Wireless TTY Forum. On behalf of its members, the Cellular Telecommunications Industry Association ("CTIA")³ respectfully submits its comments to the criteria set forth in the Consumer Criteria Document.

¹ The Wireless TTY Forum 6 was held on July 20-21, 1998 in Washington, D.C.

² The Proposal states that each wireless carrier would provide by October 1, 1998, at least one compatible digital phone model, at a reasonable price, for each digital technology that the carrier offers. Manufacturers of CMRS equipment have a separate obligation under Section 255 of the Communications Act with respect to the accessibility or compatibility of their products for TTY users.

³ CTIA is the international organization of the wireless communications industry for both wireless carriers and manufacturers. Membership in the association covers all Commercial Mobile Radio Service ("CMRS") providers, and includes forty-eight of the fifty largest cellular and broadband PCS

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The varied tests results, a significant breakthrough isolating one source of the problem for one digital technology, and the need for TTY performance standards suggest that further research needs to be conducted in order to provide technically feasible solutions for TTY users to access 9-1-1 over digital wireless systems. Hence, compliance by October 1, 1998, for a short-term solution for some digital technologies may be technically impossible.

While the "One Phone Model per Service Provider" proposal is moot with respect to the October 1, 1998, compliance date, some of the listed criteria, i.e., Criteria 1.0 and Criteria 4.4, provide useful guidance to wireless service providers and manufacturers in their efforts to provide technically feasible solutions for TTY users to access 9-1-1 over digital wireless systems. Accordingly, CTIA has addressed these criteria in a proposed workplan of the wireless telecommunications industry for TTY access over digital wireless systems.⁴

Many criteria, however, implicate marketing, advertising and customer care issues as well as pending regulatory issues before the Federal Communications Commission.⁵ The Wireless TTY Forum is not the appropriate venue to address such issues, because the Forum's primary focus is to seek and develop technically feasible solutions for TTY users to access 9-1-1 over digital wireless systems. Many representatives of wireless carriers and manufacturers that attend the TTY Forum meetings do not have the authority to bind their respective companies nor the wireless industry with respect to these issues. Moreover, these issues transcend the FCC's requirements governing access to 9-1-1 with

providers. CTIA represents more broadband PCS carriers and more cellular carriers than any other trade association.

CTIA has drafted a proposed workplan of the wireless telecommunications industry for TTY access over digital wireless systems. On September 4, 1998, CTIA sent a copy of the proposed workplan to representatives of the consumer advocacy groups, the TTY manufacturers and representatives of public safety organizations seeking their input. The draft document is offered to stimulate discussion and solicit views of the respective stakeholders of the TTY Forum.

⁵ See Criteria 2.0 through 5.0 of Consumer Approved Criteria for Acceptance of "One Phone Model Per Service Provider as of October 1" Proposal. Attached hereto as Appendix A.

TTY devices over wireless systems, and may implicate the wireless industry's obligations under Section 255 of the Communications Act of 1934, as amended. Therefore, it is more appropriate to address such issues in the broader context of Section 255.

The wireless industry is committed to working with consumer advocacy groups representing the deaf and hard of hearing to provide viable and practical solutions for TTY access over digital wireless systems. Accordingly, CTIA extends an invitation to the drafters of the Consumer Requirement Document to meet with CTIA's senior staff to address these issues in the context of CTIA's inter-disciplinary approach to accessibility under Section 255.

Thank you for the opportunity to address the Forum. CTIA looks forward to meeting with the drafters of the Consumer Requirement Document in the near future.

Sincerely,



Andrea D. Williams
Assistant General Counsel

Attachment

cc: Dan Phythyon
Elizabeth Lyle
Dale Hatfield
John Cimko
Pam Gregory

APPENDIX A

Consumer Approved Criteria for Acceptance of "One Phone Model Per Service Provider as of October 1" Proposal

Draft July 20, 1998

1.0 Digital Access

- 1.1 The nominally accessible model will use the digital wireless system; that is, it will not achieve compliance by defaulting to analog.
- 1.2 Each service provider must provide one accessible model for each digital technology supported by that service provider.
- 1.3 Voice-through, VCO and HCO must be supported. (This simply means that the call must be able to handle voice and TTY alternating on a call.)

2.0 Time period

- 2.1 One-model-per-provider to be acceptable for one year, after which other models supported must be accessible.

3.0 Availability of model

- 3.1 Model and related adapters should be easily and quickly obtainable, in line with other customers' experience when purchasing.
- 3.2 Special ordering from the supplier/vendor should not be required..

4.0 Features, functions, and price

- 4.1 Features, functions, and price of the phone should be representative of a cross section of all digital phones supported by the service provider, and should not be limited to only those features, functions or price available on the lowest- or highest-end digital phones.
- 4.2 Adapters and extra parts must not incur additional expense over cost of phone.
- 4.3 Customer must not be required to pay for retrofitting TTY to fit the phone model
- 4.4 Essential features include
 - 4.4.1 Model must have built-in vibrating ring signal or come with remote vibrator. (If handsfree adapter is plugged in, phone should still vibrate.)
 - 4.4.2 Volume control
 - 4.4.3 Ability to pass through sounds on the line to the TTY (so that the user can monitor ring, busy, etc.)
 - 4.4.4 A visual indication when call has been disconnected.

5.0 Customer Information

- 5.1 A single point of contact should be identified for obtaining customer information about digital telephones and their compatibility with TTYs. Contact must be available via fax and e-mail; and where accessible by voice phone, direct access by TTY should also be provided.

- 5.2 Service providers will advertise the availability of an accessible model in consumer publications reaching deaf and hard of hearing TTY users.
- 5.3 Television ads for digital wireless service shall be captioned.
- 5.4 If there are account problems, some service providers give access only for calling to the accounting department (e.g., a three-digit number). Such numbers must be TTY-accessible.