



CTIA

Cellular Telecommunications Industry Association

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Andrea D. Williams  
Assistant General Counsel

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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

September 29, 1998

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

**Re: Ex Parte Presentation  
CC Docket No. 94-102**

Dear Ms. Salas:

On Monday, September 28, 1998, Mr. Edward A. Hall and Mr. Todd Lantor, Co-Chairs of the Wireless TTY Forum sent the attached letter to Mr. Dan Phythyon, Chief of the Wireless Telecommunications Bureau. The letter is sent on behalf of the members of the Wireless TTY Forum and requests an extension of three months to the Commission's October 1, 1998, compliance date for CMRS carriers to comply with the Commission's rules governing TTY access to 9-1-1 over digital wireless systems. See 47 C.F.R. Section 20.18(c).

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

Sincerely,

*Andrea D. Williams*  
Andrea D. Williams  
Assistant General Counsel

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List A B C D E



September 28, 1998

Wireless Industry TTY Forum  
CTIA  
1250 Connecticut Ave N.W.  
Suite 200  
Washington, DC 20036

Dan Phythyon  
Chief  
Wireless Telecommunications Bureau  
FCC  
2025 Mst N.W.  
Room 500  
Washington, DC 20554

Dear Mr. Phythyon

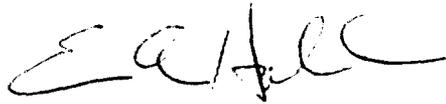
On behalf of the members of the Wireless Industry's TTY Forum an extension of three (3) months to the TTY compliance date is hereby requested. The three month extension would push-back the TTY compliance date as specified in 47 C.F.R. Section 20.18(c) from October 1, 1998 to January 1, 1999.

As you know the TTY Forum was established as a result of the FCC requirement to support TTY signaling over digital air interfaces. The Forum held its first meeting during September 1997 and has conducted a total of seven (7) meetings since then. The members of the Forum include all "stakeholders". Formally represented at all TTY Forum activities are representatives of the deaf and heard of hearing, TTY manufacturers, public safety, wireless phone manufacturers and wireless service providers. Our accomplishments are reflected in the quarterly TTY Reports submitted by CTIA on behalf of the Forum.

The intent of the Forum is to provide the FCC with consensus opinions, comments and recommendations, based on technical findings, as to how best to achieve the goal. The Forum has been fastidious in its work, scope and charter. Work completed to date has demonstrated effective diagnosis and problem solving techniques. The technical tests have broken new ground, discoveries have been significant and *Agreement Statements* on critical issues have been reached. My conversations with you and your staff have emphasized that this issue is and remains extremely technically challenging. Regardless, the Forum continues as a cohesive body, ready and willing to face those challenges.

We all agree that it is unfortunate that this effort is behind schedule. None the less, we remain committed to our goal. As of this date however, it is the consensus of the Forum that an additional three months will allow the completion of various lab/field testing, the

culmination of significant technical findings, comments and recommendations for an "agreed to path forward" to be submitted to the FCC for final review and consideration. The consensus of the Forum, in its entirety, supports the spirit of the *CTIA Request for Extension* dated September 11, 1998 and asks that the Wireless Bureau, acting within its purview, grant the TTY Forum an extension of three months to properly complete its recommended path forward.



Edward A. Hall  
Co-Chair, TTY Forum  
CTIA



Todd Lantor  
Co-Chair, TTY Forum  
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