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Via Electronic Comment Filing System

November 11, 2014

Ms. Marlene H. Dortch
Secretary
Office of the Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

RE: *Wireless E911 Location Accuracy Requirements*, PS Docket No. 07-114

Dear Secretary Dortch:

ASL Services Holding, LLC (“ASL/Global VRS”), a federal Telecommunications Relay Service Fund (“Fund”) eligible provider of Internet-based video relay services (“VRS”) to the Deaf and Hard-of Hearing (collectively, “Deaf”), expresses its support of the Consumer Groups’¹ request that the Commission now formally act on its proposed rules governing wireless e911 location accuracy.² As the public, including millions of Deaf Community members,³ increasingly rely on wireless mobile devices to communicate, it is incumbent for the Commission to act on its proposed location accuracy, lest the public, and Deaf users in particular, are face significant risk of injury or death.

In 2013, ASL/Global VRS introduced its first wireless VRS application for Android-based mobile devices and this year introduced a VRS application for IOS-based devices. These applications have been widely and quickly adopted by the Company’s registered subscribers; testament to the applications’ desirability in freeing the Deaf from communicating via stationary location computers. To be sure, the adoption of wireless device VRS applications has significantly contributed toward achieving functional communications equivalency to what the general public otherwise enjoy.

¹ National Association of the Deaf, American Association of the Deaf-Blind, Cerebral Palsy and Deaf Organization, and Telecommunications for the Deaf and Hard of Hearing, Inc.

² See, Consumer Groups’ *Notice of Ex Parte Communications*, PS Docket No. 07-114 (November 3, 2014).

³ See, Gallaudet University Library, [Deaf Statistics](#) (Updated February 2014)

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Yet in the absence of the proposed wireless location accuracy requirements, increasing numbers of Deaf wireless device users face even greater risk than other members of the public. Under current Commission rules, Deaf users bear full responsibility for establishing their physical location (“Registered Location”).⁴ With the growing adoption of mobile communications devices, these rules unwittingly place the onus on Deaf wireless device users to either constantly update their Registered Location or bear a disproportionate risk not assumed by other wireless users. Deaf wireless device users who cannot, or have not, updated their Registered Location when using a mobile device, risk that first responders will not be able to locate them quickly.

This risk compounded by these users’ inability to hear well, if at all. Relay service providers are required to ask for location at beginning of a 911 call under current rules and standard practice. Nevertheless, automated corroboration of a Deaf caller’s actual location required under wireless location accuracy requirements would supplement *ad hoc* location confirmations for the Deaf and save precious seconds that could mean the difference between life and death.

Location accuracy is critical for the safety of all wireless users and for the Deaf in particular. In addition to supplementing current Registered Location regulations applicable to Fund eligible providers, adoption of the Commission’s wireless E911 location accuracy regulations will bring the increasing number of Deaf wireless users closer to achieving functional equivalency to the communications capabilities other users take for granted.

For these reasons, ASL/Global VRS strongly encourages the Commission to act expeditiously in adopting the proposed wireless E911 location accuracy regulations, consistent with the Consumer Groups’ recommendations. ASL/Global VRS further urges the Commission to accord the Consumer Groups a voice in its location accuracy proceedings to ensure that the unique needs of the growing number of Deaf Community wireless device users are fully understood and considered.

Respectfully Submitted,

MILLER ISAR, INC.



Andrew O. Isar

Regulatory Consultants to
ASL Services Holdings, LLC

⁴ 47 C.F.R. §64.605(b)(4)(ii), Emergency calling requirements, “If the VRS or IP Relay is capable of being used from more than one location, provide their registered Internet-based TRS users one or more methods of updating their Registered Location, including at least one option that requires use only of the iTRS access technology necessary to access the VRS or IP Relay. **Any method utilized must allow a registered Internet-based TRS user to update the Registered Location at will and in a timely manner.**[emphasis supplied].”