December 23, 2104

VIA ELECTRONIC FILING (ECFS)
Marlene H. Dortch, Secretary
Federal Communications Commission
445 Twelfth St. S.W.
Washington D. C. 20554

Re: NOTIFICATION OF EX PARTE COMMUNICATION
IP Relay Services currently available to deaf-blind users through Sprint, Telecommunications Relay Service and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities, CG Docket No.0-123;

Dear Ms. Dortch,

On December 11, 2014 , Sue Ruzenski, and Chris Woodfill from the Helen Keller National Center and Bryen Yanashko, a deaf-blind consumer and advocate met with Kris Monteith (Consumer and Governmental Affairs Bureau "CGB", Karen Strauss (CGB), Greg Hlibok (Disability Rights Office "DRO"), Elliot Greenwald (DRO), Bob Aldrich (DRO), Caitlin Vogus (DRO) and Darryl Cooper (DRO).The purpose of this meeting was to discuss the concerns of deaf-blind individuals with the recent closing of Purple IP Relay and the inaccessible features of the Sprint service provision, currently the only option available to all consumers of IP Relay Services.

Specifically HKNC reviewed the 12 functionalities summarized by a Sprint representative based on feedback from expert users who are deaf-blind that would provide deaf-blind users with improved access. These functionalities and a brief description of each are as follows:

1) Apps not braille accessible – until the user types the message, all of the information sent to the device is viewed as one long block of text. Each time the operator types a new series of words, the focus of the Voice Over, which also controls what the Braille display does jumps to the top of that string of text. This refreshing of the content in this manner makes it extremely difficult to use for even more advanced users, and impossible for a slower braille readers. Also on the web service, the message history window is one large block of text. Because of the way it is designed, the content is rendered in screen readers and in braille in such a way that there is no easy manner in which one can navigate.

2) No Instant Messaging (IM) access – Many Braille note taking devices that are preferred for a multitude of reasons by individuals who may not have access to iOS app would access the service previously by using Google Talk and/or AOL's Instant Messaging. If this were re-implemented, it would allow for a more customizable user experience, as IM services can be used with all sorts of devices in all different types of configurations. The recommendation is for Google Talk/Jabber over AIM, as this is compatible with more devices.

3) Full conversation screen options work best

4) Pacing functionality to allow users to read at their own pace – by modifying how information is presented, a Braille user and a low vision user will not be distracted by scrolling of text. An IM service would address this point.

5) Cursor positioning when reading typed text – see example provided in answer to point 1.

6) Consider using a similar application like Nextalk Text Service that is easy to use

7) Standalone app for PCs and MACs, rather than web-browser driven platform – the less cluttered the interface, the more usable it will be. In other words, less features on the main screen of the app other than the content of the call itself, and larger font sizes would help.

8) Need for large font options – self explanatory

9) Braille displays are not accessible – Same as point 1.

10) Simple basic interface works best – self explanatory.

11) Grade / contraction preference – to be driven by screen reader and not the application. The Braille type would be under the control of the user. Also, if an IM service were developed, the user could control whether they wanted contracted or uncontracted Braille. Nothing would be required of Sprint in this case with regard to Braille grade.

12) Screen customization- the user should be able to choose the colors of the background and fonts within the app. Some users have different vision needs. For example, someone may prefer dark blue with yellow fonts, while another may prefer bright background with dark fonts etc. Simply only having an inversion severely limits the ability for a user to have an app that meets their accessibility needs.

13) (New issue, usability test) Users have reported problems where text is visually cut off when using large fonts on their devices, including iOS. It is recommended Sprint test their app in various font sizes to verify that everything is readable.

In addition we discussed the concerns with the use of IM as a platform for phone conversations due to some providers not being secure such as AIM. While there was agreement that security is a concern, the alternative is that there may be no access whatsoever for some users. This is especially true for notetakers and we recommended that we return to IM as an interim solution until the accessibility problem is properly addressed.

We appreciate your promptness in addressing this urgent issue that will improve the services and accessibility for individuals who are deaf-blind. HKNC would like to assist in any way possible with field testing any new equipment or programs. If there is a possible way for the FCC to consider implementing a system whereby the industry could be properly reimbursed for accessibility development consultations there may be more of a willingness by vendors to invest R & D resources in accessibility development.

This filing is made in accordance with Section 1.1206 (b) (1) of the Commissions' rules. In the event that there are any questions concerning this matter, please contact the undersigned.

Respectfully submitted,

Sue Ruzenski
Executive Director

cc: Kris Monteith
Karen Peltz Straus
Greg Hlibok
Bob Aldrich
Eliot Greenwald
Caitlin Vogus
Darryl Cooper