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EX PARTE
VIA ELECTRONIC FILING

September 24, 2015

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Portals II, Room TW-A325
Washington, DC 20554

Re: Request for Comment on Petition for Rulemaking to Update the Commission's Rules for Access to Support the Transition from TTY to Real-Time Text Technology and Petition for Waiver of Rules Requiring Support of TTY Technology, GN Docket No. 15-178

Dear Ms. Dortch:

On Wednesday, September 23, 2014, Robert Quinn and the undersigned representing AT&T met via telephone with Rebekah Goodheart, Legal Advisor to Commissioner Clyburn. AT&T urged support for expeditious Commission action to waive, on a temporary basis, the Commission's requirements to support TTY technology for devices and services during the pendency of the real-time text (RTT) rulemaking and until RTT is fully deployed to allow it to offer voice over internet protocol (VoIP) services that are unable to, and do not, reliably support TTY.

Limitations inherent in the operation of TTY may impair or altogether prevent TTY message delivery over Wi-Fi networks. Instead of retrofitting TTY for next-generation networks and services, AT&T plans to surmount these accessibility challenges by deploying RTT. Until RTT is fully deployed and allowed as an alternative to TTY under Commission rules, AT&T is faced with a choice—not offer Wi-Fi calling and other new VoIP services, which would put AT&T at a competitive disadvantage vis-à-vis other wireless providers that are currently offering Wi-Fi-calling, or seek a waiver of Commission rules requiring the provision of TTY. AT&T seeks this waiver to allow it to introduce cutting-edge VoIP services while remaining in compliance with Commission accessibility rules.

Pursuant to Section 1.1206 of the Commission's rules, a copy of this notice is being electronically filed in the above-captioned dockets. Please do not hesitate to contact me with any questions regarding this matter.

Sincerely,

/s/ Frank S. Simone

cc: R. Goodheart