<div align="center">

Before the
Federal Communications Commission
Washington, D.C. 20554

</div>

In the Matter of	)	
	)	
Petition for Waiver of Rules Requiring	)	GN Docket No. 15-178
Support of TTY Technology	)	

<div align="center">

IP-Voice Accessibility Status Report of AT&T

</div>

Pursuant to the Federal Communications Commission's Order released October 6, 2015,[1] AT&T submits this semi-annual report of its progress toward the development of IP-based accessibility solutions and the status of the availability of those solutions. AT&T is notifying customers in bill messages, on its website, and by other effective means about how to access this report.

1.   **Progress and Status of Accessibility Efforts.** AT&T is developing RFC 4103-based real-time-text ("RTT") to deliver enhanced, interoperable disability access over IP-based networks. AT&T is completing its network and IP-design documentation and is scheduled to begin extensive lab testing in the coming months on physical and virtual network elements. To accommodate manufacturer timelines for the development and deployment of an RTT solution embedded in wireless devices, AT&T will initially deploy an application-based over-the-top ("OTT") RTT solution.

AT&T has reached agreement with an application vendor for development of the OTT RTT solution. AT&T has also reached agreements with network vendors for the software upgrades needed to support this OTT RTT application and for the delivery of virtual media resource functions that will be used for the backward compatibility functionality. Around July

---

[1] Petition for Waiver of Rules Requiring Support of TTY Technology, *Order*, GN Docket No. 15-178, 30 FCC Rcd 10855 (2015).

2016, initial versions of the OTT RTT application, network software upgrades, and virtual media resource functions are expected in AT&T Labs for testing. The testing plan will be performed over multiple network configurations and include, among other activities, analysis of E911 capabilities, backward compatibility functions, RTT-to-RTT calls, authentication, IP Multimedia subsystem (IMS) registration, integrated dialer capabilities, and administrative processing and rating of RTT sessions. Subsequent software releases will be developed based upon the test feedback provided and will also be subjected to further testing.

AT&T expects to reach agreements with mobile device manufacturers to provide an RTT solution embedded within mobile devices after the Alliance for Telecommunications Industry Solutions ("ATIS") and 3rd Generation Partnership Project ("3GPP") finalize the RTT standards (notably, RTT E2E (end-to-end) Service Description and RTT Mobile Device Behavior Specification), followed by testing of that embedded solution. ATIS and 3GPP are conducting regularly scheduled meetings to advance these standards and AT&T is hopeful the standards will be finalized in mid-to-late 2016.

2.   **Interoperability.** AT&T plans to work closely with other wireless carriers to provide interoperable RTT across carriers. At this time, wireless carriers are in the early stages of technology development and thus, challenges are as yet undefined. However, the RTT E2E Service Description standard progressing before ATIS is expected to address interoperability issues, among others, which should minimize the questions and challenges faced by wireless providers seeking to develop interoperable RTT.   AT&T will provide more clarity on interoperability issues in future RTT reports.

3.   **Backward Compatibility.** As AT&T has explained, backwards compatibility with TTY is a key feature to RTT's suitability as a long-term TTY replacement. AT&T is in the

process of developing an RTT-TTY interworking gateway that will allow RTT users to communicate with TTY users, including E911 emergency services, 711 relay services, and accessible businesses. AT&T expects the backward compatibility function to be delivered to AT&T Labs with the OTT RTT application and network software upgrades around July 2016 for testing.

4. **911 Call Delivery.** E911 call delivery will be advanced upon resolution of the backward compatibility solution described above. Generally, OTT RTT will deliver the 911 call over the best available and accessible network (e.g. Wi-Fi, LTE).

5. **Estimated Timeline:** Thus far, AT&T has not encountered any insurmountable obstacles. AT&T expects to launch an OTT application to perform RTT functionality no later than December 2017. AT&T hopes to offer mobile devices with a manufacturer embedded RTT solution in 2018, dependent on standards setting and manufacturer development cycles.

Dated: April 6, 2016   Respectfully submitted,

Robert Vitanza
Larry Jones
Gary L. Phillips

AT&T Services, Inc.
208 S. Akard Street
Rm 2914
Dallas, Texas 75202
(214) 757-3357 (Phone)
(214) 746-2212 (Fax)