



June 16, 2016

VIA ELECTRONIC FILING

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
445 Twelfth Street, SW
Washington, DC 20554

Re: Ex Parte Presentation, *Transition from TTY to Real-Time Text Technology*, CG Docket No. 16-145; *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 June 14, 2016, the undersigned participated on behalf of CTIA in a panel discussion that included Karen Peltz Strauss, Deputy Bureau Chief, Consumer and Governmental Affairs Bureau, and Suzy Rosen Singleton, Acting Chief, Disability Rights Office, Consumer and Governmental Affairs Bureau at the M-Enabling Summit in Arlington, VA titled "Global Opportunities for Real Time Text" that discussed the above-referenced proceedings.¹ In addition to panel participants, numerous M-Enabling Summit registrants attended the panel.

¹ The other panel participants were (i) Aaron Bangor, Lead Accessible Technology Architect, Corporate Accessibility Technology Office AT&T; (ii) Andrea Saks, International Telecommunications Specialist for the Deaf, Chairman ITU Joint Coordinating Activity on Accessibility and Human Factors; Coordinator IGF DCAD (Dynamic Coalition on Accessibility and Disability) and G3ict Permanent Representative to the ITU; (iii) Gregg Vanderheiden, Ph.D., Trace R&D Center, University of Maryland - College Park; and (iv) Christian Vogler, Director, Technology Access Program, Gallaudet University. At the conclusion of the panel, Ms. Strauss requested participants file an ex parte notice in the above-referenced dockets.



CTIA expressed its support for the underlying goals of the Notice of Proposed Rulemaking in the above-referenced proceedings – namely the Commission’s proposal to modify the outdated, technology-specific rules that require Commercial Mobile Radio Services and associated equipment to support text telephone technology (“TTY”). As deaf, hard of hearing, and speech-impaired consumers (“consumers”) increasingly adopt innovative wireless services, including Text-To-911, CTIA supports the Commission affirming the wireless industry’s ability to transition toward solutions like real-time text (“RTT”), which may better meet the needs of today’s consumers.

CTIA urged the Commission to provide flexibility for wireless providers and equipment manufacturers to develop and implement the necessary network and handset standards and capabilities to support RTT. CTIA agreed with others on the panel that modern technology, such as RTT, presents an opportunity to greatly expand communications options for consumers, but to best seize the opportunity, the Commission must allow flexibility for industry and manage expectations among consumers.

Pursuant to Section 1.1206 of the Commission’s rules, a copy of this letter is being electronically filed via ECFS and email to the Commission participants on the panel. Please do not hesitate to contact the undersigned with any questions.

Sincerely,

/s/ Matthew Gerst

Director, Regulatory Affairs
CTIA

cc: Karen Peltz Strauss
Suzy Rosen Singleton