

**BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C.**

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)
)
Revision of the Commission's) CC Docket No. 94-102
Rules to Ensure Compatibility) RM-8143
With Enhanced 911 Emergency)
Calling Systems)

**JOINT COMMENTS OF THE
CELLULAR TELECOMMUNICATIONS INDUSTRY ASSOCIATION
AND
PERSONAL COMMUNICATIONS INDUSTRY ASSOCIATION**

The Cellular Telecommunications Industry Association ("CTIA")¹ and the Personal Communications Industry Association ("PCIA")² ("Joint Commenters"), on behalf of its members, submit

¹ CTIA is the international organization of the wireless communications industry for both wireless carriers and manufacturers. Membership in the association covers all Commercial Mobile Radio Service ("CMRS") providers, including 48 of the 50 largest cellular and broadband personal communications service ("PCS") providers. CTIA represents more broadband PCS carriers and more cellular carriers than any other trade association.

² PCIA is the international trade association created to represent the interests of both the commercial and private mobile radio service communications industries. PCIA's Federal of Councils includes: the Paging and Messaging Alliance, the Broadband PCS Alliance, the Site Owners and Managers Association, the Association of Wireless Communications Engineers and Technicians, the Private Systems Users Alliance, and the Mobile Wireless Communications Alliance. In addition, as the FCC-appointed frequency coordinator for the 450-512 MHz bands in the Business Radio Service, the 800 and 900 MHz Business Pools, the 800 MHz General Category frequencies for Business Eligibles and conventional SMR systems, and the 929 MHz paging frequencies,

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its responses in the above-captioned proceeding pursuant to the Commission's Order granting a 45-day extension of the suspension of enforcement Section 20.18(c) of the Commission's Rules from October 1, 1998, to November 15, 1998.³

In the Extension Order, the Wireless Telecommunications Bureau requested answers to specific questions to help inform their decisionmaking and to advise the Commission as to whether they should continue the suspension of the Commission's enforcement of Section 20.18(c) of its rules.⁴ Attached as Appendix A, and incorporate herein, are the Joint Commenters responses to these questions.

In its response, the Joint Commenters demonstrate that there does not appear to be a near-term solution that will allow the Baudot signal of a TTY device to pass through the Vocoder of a digital air interface and achieve a character error rate comparable to analog technology, *i.e.*, less than one percent. Commission staff, however, has made it very clear that the wireless industry must continue further testing in order to compare the character error rates among the various digital air

PCIA represents and services the interests of tens of thousand of licensees.

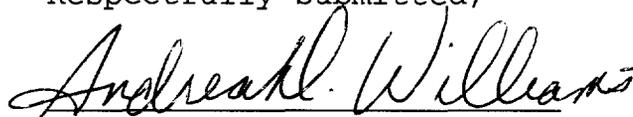
³ See In the Matter of Revision of the Commission's Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems, CC Docket No. 94-102, Order, DA98-1982, (rel. Sept. 30, 1998) ("Extension Order").

⁴ Extension Order at 5.

interfaces. Although the wireless industry has concluded that additional testing will not yield any new or significant information on character error rates, it reluctantly has agreed to proceed with additional tests.

The Workplan and the Test Procedures filed by CTIA on behalf of the Wireless TTY Forum demonstrate that additional time is needed for wireless carriers to comply with the Commission's rules governing TTY access to 9-1-1 over digital wireless systems. Accordingly, the Joint Commenters respectfully request that the Bureau, pursuant to its delegated authority, continue the suspension of enforcement of Section 20.18(c) of the Commission's Rules with respect to digital wireless systems.

Respectfully submitted,


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APPENDIX A

- 1. What specific actions are being taken by individual carriers to comply with the notification requirements outlined in the E911 Reconsideration Order (i.e., the requirement that carriers make every reasonable effort to notify current and potential subscribers that they will not be able to use TTYs to call 911 with digital wireless devices and services)?**

In response to this question, CTIA and PCIA recently surveyed a cross-section of its membership in order to provide the Commission with industry data on wireless carriers' reasonable efforts to notify current and potential subscribers concerning digital wireless services incompatibility with TTY devices. The member companies responding to the survey represent virtually every size of service provider, from one market to hundreds of markets. These companies hold over 1,485 licenses -- approximately 41% of all cellular and PCS licenses -- with a total of one billion aggregated pops. Attached as Appendix B is a compilation of the data.

- 2. Has any carrier been able to meet the October 1, 1998, deadline? If so, what steps has the carrier taken that led to its ability to meet the deadline?**

Based on the discussions at the TTY Forum and informal discussions with several representatives of our member companies,⁵ no CMRS carrier offering digital wireless was able to meet the October 1, 1998, deadline. As explained in CTIA's and PCIA's request for an extension of time, no manufacturer of wireless digital handsets has a commercially available product that will allow the Baudot signal of a TTY device to pass through the Vocoder of a digital air interface and achieve a character error rate comparable to analog technology, i.e., less than 1%. It is technically impossible for CMRS carriers to comply with the Commission's rules governing TTY access to 9-1-1 over digital wireless systems until the appropriate equipment is commercially available.

- 3. For each of the digital technologies (i.e., TDMA, CDMA, GSM,**

⁵ While CTIA and PCIA have not spoken to every wireless carrier in the United States, we have informally polled a significant cross-sample of our member companies to determine whether compliance by October 1, 1998 was attainable. Based on the overwhelming response that compliance by October 1st was not attainable, CTIA and PCIA filed the request for an extension of time on behalf of its members.

and iDEN), have manufacturers been able to determine the root technical causes for the incompatibility between TTY devices and their systems? If so, what is the nature of these root technical causes for each technology?

Several manufacturers have opined on the root technical causes for the incompatibility between TTY devices and various digital wireless systems. The following are their observations.

CDMA Technology - CDG's Observations

The CDMA Development Group ("CDG") indicates that the root technical cause for the incompatibility between TTY devices and CDMA systems is the Frame Erasure Rate ("FER") of CDMA systems when using voice service. These systems are precisely tuned to operate at an FER of 1%. For typical voice signals, this FER does not cause much distortion. However, due to the slow nature of the TTY Baudot signals, this 1% FER translates into about a 7-9% Character Error Rate ("CER") -- one TTY character spans 9 CDMA voice frames. Lucent Technology's presentation at TTY Forum 5 illustrated this very clearly based on analysis, simulation, and field test results.⁶ The CDMA Development Group has made it very clear to the Wireless TTY Forum that it understands the technical limitations that cause TTY incompatibility with CDMA voice service.

TDMA Technology - Nokia's Observations

Nokia indicates that fundamentally the root technical causes are the same for all wireless digital technologies. While one technology may be more sensitive to a certain parameter than another technology, Nokia believes that all technologies are affected in various degrees by most parameters. Nokia has indicated that the primary root causes for incompatibility between TTY devices and TDMA wireless systems are: Vocoder distortion, received signal level, multi-path fading effects, receiver attack time, hand offs, adjacent and co-channel interference, various network effects, and the performance of TTY devices. The October 1998 Quarterly Status Report provides Nokia's test results from its laboratory testing of TDMA and AMPS technologies. These test results provide useful insight on the root technical causes. The data illustrates the effect of dividing the CER versus the received signal

⁶ See In the Matter of Revision of the Commission's Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems, CC Docket No. 94-102, Wireless TTY Forum: Seeking Solutions to TTY through Wireless Digital Systems, Quarterly Status Report, Appendix A, filed July 10, 1998 ("July Quarterly Status Report").

power plot into two regions: Vocoder limited and link noise limited. When the link conditions are favorable, the CER is only attributed to Vocoder distortions (CER ranged between 2 to 6%). As the link conditions worsen, the CER increases exponentially around the phone sensitivity level (approximately -113 dBm). Nokia cautions that while laboratory measurements represent the best possible case, actual field conditions may provide a much higher CER. Nokia also references field measurements performed by Philips Consumer Communications to illustrate the impact of TTY performance standards, or lack thereof, on the CER.

GSM Technology - Ericsson's Observations

Both GSM and TDMA standardized Vocoders are optimized for voice. Essentially, they are designed to carry voice calls, not TTY calls. Within TDMA and GSM technologies, test results supporting TTY calls made through a digital cellular Vocoder have not met the consumer organization's criterion, i.e., less than 1% CER. In every test, the CER has been higher than the level defined as "acceptable" by consumers. GSM tests indicate error frame rates ("EFR") of 3-6%. TDMA tests indicate EFR of 6-10%.

According to Ericsson, character errors are primarily due to the operation of the digital Vocoder. The Vocoder takes 20ms long samples of the audio input from the TTY device and tries to identify the sound in terms of filter parameters for the vocal tract model and an excitation sequence approximating the air flow through the vocal tract. A TTY FSK Baudot signal is very different from speech so the Vocoder will consistently have difficulty reproducing a sound that matches the Baudot tones. The differences lie both in the actual sound content but also in how the sound is interpreted. A Baudot tone is transmitted at 45 baud, i.e., 45 characters per second. A human will most likely not utter more than 10 syllables per second. If a human speaks 10 syllables per second, each syllable will last for 100ms. This means that the sound will not change drastically from each 20ms segment to each subsequent 20ms. For a Baudot tone, the interpretation of the sound content is made every 22ms (1/45) which means that if one 20ms frame is misinterpreted a whole character is lost while for speech this would only affect the sound of one fifth of a syllable. Baudot places different and more stringent requirements on the Vocoder.

Cellular and PCS Vocoders are somewhat different in design. According to Ericsson, the GSM Vocoder has a higher success rate in passing TTY calls than the IS-136 TDMA Vocoder due to the fact that a GSM Vocoder uses a higher data rate in the

Vocoder. The higher data rate makes it possible for the GSM Vocoder to handle more sounds than the TDMA Vocoder. Overall, the GSM is designed to identify and match more tones which reduces the number of character errors during a transmission.

iDEN Technology - Motorola's Observation

iDEN is a digital air interface used by Enhanced Mobile Radio Service providers. Currently, there is one service provider deploying this technology on a nationwide basis. Motorola has performed extensive testing, both in the lab and in the field, using the iDEN handset with Baudot TTY equipment that is readily available.

According to Motorola, testing TTY Baudot tones in the lab with a strong RF signal results in few errors. However, in field tests, the TTY Baudot tones are subject to an unacceptable CER, particularly when there is not a strong signal. The majority of the TTY devices in the market today do not emit tones that are as robust as the human voice. While iDEN continues to work with TTY manufacturers that are enhancing the Baudot tones, it will continue to provide ASCII data to customers who are deaf and hard-of-hearing.

4. What potential solutions have been submitted to appropriate standard-setting bodies or forums for their review and analysis?

Philips Consumer Communications has submitted a proposal advocating the development of a new service option using the EVRC Vocoder to provide simultaneous voice and dedicated user data on a CDMA fundamental traffic channel. This proposal has been submitted to the appropriate standard-setting body, TIA's TR45.5 Committee, as a Request for Project Number to Support Development of a Service Option to Provide Simultaneous Voice. It has been remanded to TR45.5 Working Group I for review. Philips estimates 18 to 24 months for the development of a standard.

The TTY Forum has drafted a Technical Information Document for a modified voice-based solution, i.e., coupling via a direct electrical connection between the TTY device and a digital wireless handset. The TTY Forum plans to finalize the TID at the next TTY Forum Meeting which is scheduled for November 4-5, 1998, and make it available shortly thereafter for those carriers that prefer this modified voice-based solution. According to the Workplan of the Wireless TTY Forum, a Standards Requirements Document ("SRD") will be drafted and submitted to TR45.1 for review and analysis after the TID is finalized by the Forum.

Working Group 2 of the Wireless TTY Forum has finalized its work on the Standards Requirements Document for a Circuit-Switched Data Solution. Working Group 2 has attempted to present the final draft of the SRD to the TTY Forum for adoption. However, the Forum has focused on voice-based solutions and the FCC's October 1st compliance date and has not voted on the item. The SRD is essentially ready and may be submitted to TR45 as early as December 1998. The Working Group is very optimistic that the TTY Forum will consider the SRD for adoption at the November 1998 TTY Forum Meeting.

Qualcomm's White Paper, which proposes a hybrid data solution,⁷ has been reviewed by the CDMA Development Group's TTY Team and their comments have been incorporated into the White Paper. The White Paper has been submitted to TIA's TR45.5 subcommittee for review.

5. Are there any segments of the wireless industry that might be crucial to the development of the potential solutions that are not represented in the Forum, e.g., manufacturers of Inter-Working Functions (IWF), who would have to modify IWF software as part of a data solution) and is their representation necessary for implementation of such solutions?

Manufacturers of IWF are crucial to the development of Qualcomm's Proposed Hybrid Solution for CDMA Technology⁸ and Philips Consumer Communications' proposed method of providing nearly error-free transmission of TTY FSK Baudot text over CDMA digital air interface.⁹ Manufacturers of adapters and a common level interface are crucial to the development of the modified voice-based solution which allows coupling of the TTY to a digital wireless handset via direct electrical connection.

While manufacturers of IWF, adapters and interface devices have a critical role in the development of the potential solutions, their representation at the TTY Forum is always

⁷ See In the Matter of Revision of the Commission's Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems, CC Docket No. 94-102, Wireless TTY Forum: Seeking Solutions to TTY through Wireless Digital Systems, Quarterly Status Report, Appendix L, filed Oct. 13, 1998 ("October Quarterly Status Report").

⁸ October Quarterly Status Report at 11.

⁹ October Quarterly Status Report at 12-13.

welcomed and may provide additional insight to the technical challenges. However, it would be far more productive and efficient for these manufacturers to work directly with the various wireless digital technology groups and standard-setting bodies to develop the necessary IWF software, adapters and interface devices. In that regard, the TTY Forum is drafting a letter to IWF manufacturers concerning the implementation of V.18 standard. It is anticipated that the TTY Forum will finalize the draft at the next TTY Forum meeting scheduled for November 4-5, 1998.

6. Explain the possible negative consequences of any potential solutions for TTY users, e.g., the reduction in throughput that would result from the insertion of additional bits between transmitted characters.

The Wireless TTY Forum has developed a matrix which provides information concerning the advantages and disadvantages of proposed voice-based solutions and data-based solutions. See Appendix C for this information.

7. For each of the digital technologies, what would be the timetable for implementation of a data solution on an equitable basis with voice services offered?

Based on the information provided in the Workplan and the associations' experience in the standards-setting process, estimated implementation time frames range between 12 and 18 months. While the standards for GSM, TDMA, iDEN and CDMA support the IWF functionality, implementation requires completion of product development and deployment, including billing capabilities for data, installation of TTY software in the subscriber terminal, installation of the IWF infrastructure which may be installed per switch or shared among a carrier's switches. In addition, V.18 capable modems need to be manufactured for use in the United States. The estimated timeframes are contingent upon several factors: availability of modems incorporating V.18 standard or other enhanced protocols; timely resolution of any unanticipated technical glitches in product development and deployment as well as installation of the IWF infrastructure; and the availability of the appropriate engineering staff.

8. If an extension were granted in order to reach a long-term solution to the problem of incompatibility between TTY devices and various digital systems, what could each carrier do in the interim to accommodate TTY users on wireless systems?

Based on the survey,¹⁰ an overwhelming majority of the carriers

¹⁰ See Appendix B.

that provide analog and digital services offer and will continue to offer analog service and products as an interim accommodation for TTY users in those markets where they provide both analog and digital services.

Several responding carriers offer only digital services in some or all of their markets. Some of these carriers are advising TTY users to purchase or use analog cellular service until a data solution is developed. Several are considering the possibility of developing proprietary solutions that may accommodate TTY users in their markets where they offer only digital service. In both cases, the carriers are notifying subscribers and potential subscribers of the limitations of their digital systems with respect to the use of TTYs.

- 9. At what laboratory location will the upcoming testing of digital wireless phones be conducted? Will carriers ensure that representatives from all Forum member groups participate in the testing? Will field tests be conducted, including tests involving actual TTY users, following completion of the laboratory tests?**

Please refer to Test Plan developed by the Wireless TTY Forum for location of laboratories.

The Test Plan indicates that laboratory and simulated field tests will be conducted. The TTY Forum will provide advance notice of the test dates, location of the test laboratories, and contact person to all interested parties. Technical representatives of TTY manufacturers, Gallaudet University, PSAPs and the FCC are encouraged to participate in the testing and should contact the appropriate manufacturer or carrier conducting the test to discuss participation.

- 10. Have carriers provided equipment and wireless service to TTY users so that users can conduct their own field tests? If equipment and service have not been provided, what obstacles have prevented carriers from doing so? What are the carriers' plans for providing equipment and service to facilitate future field tests by TTY users?**

Two wireless carriers serving the Washington, DC-Baltimore area initially provided Gallaudet University with equipment and wireless services to conduct field tests. Although the initial subscriptions expired, both carriers were amenable to extending the subscriptions in accordance with their respective company policies and procedures concerning free subscriptions for test purposes. Gallaudet University accepted the offer of one service provider. However, it rejected the offer of the other carrier, because Gallaudet University

considered it too burdensome to provide the appropriate documentation and information requested by the carrier in accordance with its company policies and procedures.

This issue was raised at the October 1998 TTY Forum Meeting, and Brian Fontes, CTIA's Senior Vice President of Policy and Administration, offered to facilitate the provision of equipment and wireless services between CTIA member companies serving the Washington, DC-Baltimore area and Gallaudet University. Mr. Fontes was willing to explore various alternatives, subject to legal review and in accordance with the regulations of local and state public service commissions and the carriers' corporate policies and procedures for handling such matters. Mr. Fontes inquired whether Gallaudet University has and could provide the appropriate documentation and information requested, Gallaudet again indicated that it was too burdensome to do so and would obtain service and equipment without CTIA's assistance. CTIA is still willing to facilitate Gallaudet University's request for equipment and services for the purpose of conducting field tests with CTIA member carriers.

APPENDIX B

SURVEY OF WIRELESS COMPANIES ON TTY ACCESS TO DIGITAL WIRELESS SYSTEMS: NOTIFICATION & INTERIM MEASURES

- **COMPANIES RESPONDING: 29**
- **RESPONDING COMPANIES THAT OFFER DIGITAL SERVICES: 23**
 - ◇ **CDMA - 9**
 - ◇ **GSM - 4**
 - ◇ **TDMA - 13**

***Note: Several carriers offer more than one type of wireless digital technology.**
- **RESPONDING COMPANIES THAT OFFER ANALOG SERVICES ONLY AS OF 10/30/98: 6**
- **ACTIONS TAKEN OR METHODS USED TO NOTIFY SUBSCRIBERS & POTENTIAL SUBSCRIBERS**
 - ◇ **Message Directly on Bill or Bill Inserts - 19**
 - ◇ **Point of Sale (brochures, buck slips, stickers, displays and other collateral materials) - 9**
 - ◇ **Customer Welcome Guides & User Guides - 2**
 - ◇ **Customer Newsletters - 1**
 - ◇ **Written materials, e.g., letters, fact sheets, Q&As, for customer service and sales/marketing reps to answer consumer questions - 5**
 - ◇ **Company's Internet Website - 3**
 - ◇ **Terms of Service Agreements/Customer Contracts - 3**
 - ◇ **Placement of notice in publications targeted specifically to the deaf and hard-of-hearing -2 (notice placed in publications that reach more than 800,000 TTY users.)**
 - ◇ **Other Efforts: prepaid card - 1; modified packaging of handsets & distribution of equipment sheets in retail outlets - 1**
- **RECOMMENDED TEXT PROVIDED BY CTIA, PCIA, OR WIRELESS TTY FORUM**
 - ◇ **Recommended Text - 7**
 - ◇ **Recommended Text with Modifications - 6**
 - ◇ **Other Text (developed by carrier) - 5**
- **INTERIM MEASURES TO ACCOMMODATE TTY USERS UNTIL DATA SOLUTIONS AVAILABLE**
 - ◇ **Offer analog service and products - 17**
 - ◇ **Inform customer that carrier does not provide analog service and direct them to other service providers in the market that may provide analog service - 1 (in markets where only digital service is offered)**
 - ◇ **Consider development of proprietary solution - 2 (provides only digital service)**

◇ **No interim solutions available at this time - 5 (provides only digital service)**

WIRELESS COMPANIES PARTICIPATING IN SURVEY

1. Advantage Cellular Systems, Inc.
2. AirTouch Communications
3. ALLTEL
4. AT&T Wireless Services
5. Bell Atlantic NYNEX Mobile
6. BellSouth Cellular Corp.
7. Bluegrass Cellular, Inc.
8. BMCT, L.P.
9. Cellcom
10. C.C. Cellular
11. CommNet Cellular, Inc.
12. Farmers Cellular Telephone, Inc.
13. Glacial Lakes Cellular 2000
14. GTE Wireless
15. Maine Wireless, L.P.
16. Omnipoint Communications
17. Powertel
18. PrimeCo Personal Communications, L.P.
19. RCC Atlantic, Inc.
20. SBC Communications (Southwestern Bell Wireless, Pacific Bell Mobile Services, Nevada Bell Mobile Systems, Cellular One)
21. SNET Wireless (SNET Cellular, Inc., Springwich Cellular, L.P., SNET Mobility, Inc.)
22. Sprint Spectrum, L.P.
23. Thumb Cellular
24. Triton Cellular Partners of Lincoln LLP (RSA Oregon - 4)
25. United States Cellular Wireless Communications
26. U S West Wireless, L.L.C.
27. Vanguard Cellular Systems, Inc.
28. Wireless One Network, L.P.
29. Xit Cellular

APPENDIX C

SOLUTIONS MATRIX AND WORKPLAN

Task Force Members to Complete the Data Base Solutions Matrix:

- Todd Lantor
- Norm Williams
- Judy Harkins
- Ron Schultz
- Nikolai Leung
- Mohamed El-Rayes
- UWCC member
- Steve Coston
- John Suprock
- Brye Bonner

Group is empowered to complete matrix below on behalf of the TTY Forum.

PROPOSED VOICE-BASED SOLUTIONS (Passing Baudot signal through the VOCODER)

Proposed Solution	Testing/ Implementation	Advantages/ Disadvantages	Consumer Requirements Supported	Milestones
<p><i>Direct Audio Connection</i> (2.5 mm Jack – Preferred Method)</p>	<ol style="list-style-type: none"> 1. Finalize Technical Information Document, 2. SRD, 3. Develop Standard, SDO 4. Notify TTY Phone Manufacturers 	<p>Advantages:</p> <ul style="list-style-type: none"> • Cost effective • Small in size • Rapid to implement • High Immunity to interference • Recognized industry connector • Does not require additional power supply • May allow connection to other devices <p>Disadvantages:</p> <ul style="list-style-type: none"> • Requires modification/ adapter to TTY • Yields no inherent improvement to CER • Supports only limited features 	<ol style="list-style-type: none"> 1. Preferred over acoustic 2. Supported 3. Supported 4. Supported 5. TBD 6. Supported 7. Supported 8. Supported 9. Supported 10. N/A 11. N/A 12. N/A 13. N/A 	<ol style="list-style-type: none"> 1. Nov 1998 2. Submit to TR45.1 – (Ericsson liaison) date TBD 3. Ericsson to identify timetable with TR45.1 – actual date to be posted on listserve 4. TBD by #3

Proposed Solution	Testing/ Implementation	Advantages/ Disadvantages	Consumer Requirements Supported	Milestones
<i>RJ11-type Modular Connection/ Jack</i> (Analog Solution)	5. Develop Technical Information Document, 6. SRD, 7. Develop Standard 8. Notify TTY Phone Manufacturers	Advantages: <ul style="list-style-type: none"> • Could support full functionality • Could support some of the embedded base of TTYs Disadvantages: <ul style="list-style-type: none"> • Physical size • Cannot use handset for VCO functions (may require separate device for HCO/VCO) 	1. Preferred over acoustic 2. Supported 3. Supported 4. Supported 5. TBD 6. Supported 7. Supported 8. Supported 9. Supported 10. N/A 11. N/A 12. N/A 13. N/A	This option is not considered a short-term solution by the Forum and therefore is not being pursued by this Forum at this time.

Proposed Solution	Testing/ Implementation	Advantages/ Disadvantages	Consumer Requirements Supported	Milestones
<i>Acoustic solution</i> – use of external landline handset	1. No Standardization required	Advantages: <ul style="list-style-type: none"> • No standardization required • Supports most embedded base of TTYs • Very Low interface cost • Short development cycle • Easily accessible to standardized landline handsets Disadvantages: <ul style="list-style-type: none"> • Highly susceptible to background noise • Bulky – requires a landline handset and cable 	1. Could negatively impact CER 2. Supported 3. Supported 4. Supported 5. TBD 6. Supported 7. Supported 8. Supported 9. Supported 10. N/A 11. N/A 12. N/A 13. N/A	TBD by manufacturer
<i>Proprietary</i> <ul style="list-style-type: none"> • Phone Products • Terminals 	Unknown	Unknown	Unknown	Unknown FCC can meet with stakeholders

Proposed Solution	Testing/ Implementation	Advantages/ Disadvantages	Consumer Requirements Supported	Milestones
<i>True RJ-11 Connection</i>	<ol style="list-style-type: none"> 1. Develop Technical Information Document, 2. SRD, 3. Develop Standard 4. Notify TTY Phone Manufacturers 	<p>Advantages:</p> <ul style="list-style-type: none"> • Supports full functionality • Support some of the embedded base of TTYs <p>Disadvantages:</p> <ul style="list-style-type: none"> • Physical size • Cannot use handset for VCO functions (may require separate device for HCO/VCO) • Requires additional power supply • Expensive • Bulky 	<ol style="list-style-type: none"> 1. Preferred over acoustic 2. Supported 3. Supported 4. Not Supported 5. TBD 6. Supported 7. Supported 8. Supported 9. Supported 10. N/A 11. N/A 12. N/A 13. N/A 	<p>This option is not considered a short-term solution by the Forum and therefore is not being pursued by this Forum at this time.</p>

Proposed Solution	Testing/ Implementation	Advantages/ Disadvantages	Consumer Requirements Supported	Milestones
<i>Vocoder Modifications</i>		<p>Not cost effective</p> <p>No modification to TTY</p> <p>Using Full rate</p> <p>Extensive international standards development and implementation process.</p> <p>Could provide more reliable CER</p> <p>Potential to degrade voice quality.</p> <p>Error detection and correction would be lower for a data tone call compared to data services.</p>	<ol style="list-style-type: none"> 1. TBD 2. Supported 3. Supported 4. Supported 5. TBD 6. Supported 7. Supported 8. Supported 9. TBD 10. Supported 11. Supported 12. TBD 13. TBD 	<ul style="list-style-type: none"> • Develop new standard. • Test new standard for baudot and voice.

PROPOSED DATA-BASED SOLUTIONS - Circuit-Switched

Proposed Solution	Testing/ Implementation	Advantages/ Disadvantages	Consumer Requirements	Milestones
<p>Inter-Working Function (IWF):</p> <ul style="list-style-type: none"> • V.18 (Baudot) • Proprietary TTY Modem 	<ul style="list-style-type: none"> • Complete Data SRD • CDMA existing IS-707 • TDMA existing IS-135 • Standards Modifications TBD based on SRD. • Test with existing TTYs for both inbound and outbound calls. • Test with PSAP, existing TTY using existing standards 	<p>Advantages:</p> <ul style="list-style-type: none"> • Reliable Communications, as good as wireline. • World-wide Standard • Requires little or no modifications to existing TTY • Could support more platforms, TTYs, PDAs, and Laptops. <p>Disadvantages:</p> <ul style="list-style-type: none"> • Not all Carriers may choose to implement data services. • Compatible with all current Baudot standards, except Ultratec's Turbocode. • Require mobile connection interface to existing TTYs. • IWF do not support VCO • IWF with Baudot not commercially available 	<ol style="list-style-type: none"> 1. Supported 2. TBD 3. TBD 4. N/A 5. TBD 6. Supported 7. Supported 8. Supported 9. Not Supported 10. Supported 11. TBD 12. Supported 13. Supported 	<ul style="list-style-type: none"> • Est. Timetable 12-18 months • Implement Baudot/V.18 in the IWF • Widespread deployment of the IWF • Update handsets to support data service.

Proposed Solution	Testing/ Implementation	Advantages/ Disadvantages	Consumer Requirements	Milestones
<i>3rd Party Gateway</i>		Advantages: <ul style="list-style-type: none"> Landlines TTY do not need to be modified. Disadvantages <ul style="list-style-type: none"> Expensive to operate and maintain. 	1. TBD 2. Not Supported 3. Not Supported 4. Supported 5. TBD 6. Supported 7. Supported 8. Supported 9. TBD 10. N/A 11. Not Supported 12. Supported 13. TBD	This option has not been fully explored by any members of the TTY Forum.
<i>Proprietary</i>	Unknown	Unknown	Unknown	Unknown FCC can meet with stakeholders

*V.18 Letter to modem manufacturers will be drafted by Dick Brandt under the TTY Forum letterhead requesting support for TTY issue.

WIRELESS TTY FORUM WORKPLAN: TTY ACCESS OVER DIGITAL WIRELESS SYSTEMS

Since September 1997, the wireless telecommunications industry (wireless carriers and phone manufacturers), manufacturers of TTY equipment, emergency and relay service providers (9-1-1 and TRS), and consumer organizations that represent individuals who are deaf and hard-of-hearing ("Stakeholders") have undertaken intensive collaborative efforts through the Wireless TTY Forum to develop technically feasible solutions for TTY users to access 9-1-1 over digital wireless systems. To date, the TTY Forum's primary focus has been voice-based solutions in an effort to find an acceptable short-term solution and to meet the FCC's compliance date. The TTY Forum has also proposed several data-based solutions for TTY access to digital wireless systems.

The wireless industry is committed to continuing intensive collaborative efforts to provide viable and practical solutions for TTY access over digital wireless systems not only for 9-1-1 purposes but also to meet the industry's obligations under Sections 225 and 255 of the Communications Act of 1934, as amended. The wireless industry acknowledges that it cannot resolve this issue in a technical vacuum, and that the wireless industry must continue to work cooperatively with TTY manufacturers, the appropriate consumer organizations and organizations representing public safety answering points ("PSAPs") to resolve this issue. Accordingly, the Wireless TTY Forum proposes the following Workplan with scheduled milestones for developing and implementing technical solutions for TTY users to access 9-1-1 over digital wireless systems.

PROPOSED WORKPLAN

I. Assessment of Test Results and Finalization of Test Plan

The TTY Forum has provided preliminary test results and demonstrations on several potential methods for addressing incompatibility between TTYs and the different wireless digital technologies. The TTY Forum developed a uniform test script that manufacturers representing various digital technologies and at least one TTY manufacturer have used in their testing. Test results, however, indicate a wide variance in the character error rate. Furthermore, trying to isolate the cause of the problem within a short time period has been a Herculean yet circumspect task with no conclusive results to date. While the goal is to minimize the character error rate, particularly in 9-1-1 situations, a certain character error rate is inherent with wireline and wireless, both analog and digital technology, and TTY devices.

The co-chairs of the TTY Forum have acknowledged the need for the development of a consistent test methodology, a uniform method of evaluating the test results ("test plan") and TTY performance standards to determine the minimal level of character error rate that TTY users can expect with certain digital technologies used with certain TTY devices.¹

A. Independent review and assessment of tests conducted to date.

The TTY Forum has requested Dr. Dale Hatfield, Chief of the FCC's Office of Engineering and Technology ("OET") to review and assess the tests conducted to date. It is anticipated that Mr. Hatfield will provide guidance to the TTY Forum on the soundness of the research conducted to date and identify any discontinuity or gaps in such research that should be explored in the development of a standardized test procedure.

¹ Since the September 1998 TTY Forum, the wireless industry has reviewed the initial test results and has concluded that additional testing would not yield new or significant information on character error rates. The wireless industry has acknowledged that there does not appear to be a voice-based solution in the near future which will allow the Baudot signal of a TTY device to pass through the vocoder of a digital air interface and achieve a character error rate comparable to the character error rate achieved with analog air interface, *i.e.*, less than 1%. Nevertheless, the wireless industry has agreed to conduct further testing to assess character error rates and in accordance with the standardized Test Procedure.

Target Date

Review and assess tests conducted to date -**Task Completed**

B. Finalization of a Standard Test Procedure

The TTY Forum with the assistance of the wireless digital technology groups² shall develop a uniform test process designed to limit and control test variables and establish a test methodology yielding better consistency in determining and comparing character error rates ("CER") across the various digital wireless technologies (CDMA, TDMA, GSM 1900, iDEN). Each wireless digital technology group has assumed responsibility for modifying the test process to accommodate testing variances of that technology.

- ◇ Draft Test Procedure – **Task Completed**
- ◇ Submit Test Process to Wireless Digital Technology Groups – **Task Completed**
- ◇ Responses due from wireless digital technology groups regarding modifications, locations of test facilities and test schedules – **10/28/98**
- ◇ Review responses from wireless digital technology groups (Test Plan Sub-task Group) – **10/28/98 – 10/29/98**
- ◇ Submit Test Procedure to FCC and distribute to wireless manufacturers and carriers – **10/30/98**
- ◇ Status Report to TTY Forum – **11/4/98**
- ◇ Review and Feedback on Test Procedures – **TBD by FCC**

C. Conduct additional tests using Test Procedures and compare new results

Each wireless digital technology group shall identify at least one test facility and advise the TTY Forum as to the availability of the test facility in order to commence testing prior to April 1999.³ Wireless manufacturers and carriers will conduct tests in accordance with the test schedules submitted and return results to

² For purposes of the Workplan, wireless digital technology groups refers to the CDMA Development Group ("CDG"), GSM North America, and Universal Wireless Communications Consortium ("UWC Consortium").

³ GSM NA has indicated that it plans to commence testing as soon as possible with a target date of January 1999 to provide test results to the TTY Forum and the FCC, provided that the following are true: 1) the test specification with modifications suggested by the GSM NA is approved and released by October 30, 1998; 2) lab based testing with real world conditions is accepted; 3) the test specification does not change dramatically; 4) manufacturers can assist the test facilities to set up the test; and 5) no unforeseen restrictions are placed on the testing.

the TTY Forum and the FCC as soon as available. TTY Forum members shall concurrently continue to research acceptable error rates, voice-based and data-based solutions during the test schedule.

The TTY Forum will provide advance notice to all interested parties of the test dates, location of the test laboratories, and contact person. Technical representatives of TTY manufacturers, Gallaudet University, PSAPs and the FCC are encouraged to participate in the testing and should contact the appropriate manufacturer or carrier conducting the test to discuss participation.

Goals and Target Dates

Refer to Test Procedure for list and availability of test labs and scheduled target dates for conducting the additional tests.

D. Analysis of test results and recommendations

The TTY Forum will review and analyze the test results and provide specific comments and recommendations to the FCC based on the test results.

Goals and Target Date

To be determined by the Steering Committee of the Wireless TTY Forum at TTY Forum - 9 scheduled for November 4-5, 1998

II. User Requirements

Consumer representatives of the TTY Forum have provided the TTY Forum with two documents outlining their criteria with respect to solutions: *Consumer Approved Criteria for Acceptance of 'One Phone Model Per Service Provider as of October 1' Proposal* ("Consumer Criteria Document") and *September 10, 1998 Memorandum from Consumer Representatives to TTY Forum* ("September 1998 Consumer Memo").

A. Consumer Criteria Document

The purpose of the document was to stimulate discussion and solicit the views of the wireless carriers and manufacturers participating in the TTY Forum. At the September 1998 TTY Forum Meeting, CTIA, on behalf of its members, submitted its comments to the criteria set forth in the Consumer Criteria Document.⁴ CTIA's senior staff and the drafters of the Consumer

⁴ Letter from Andrea Williams, Assistant General Counsel, Cellular Telecommunications Industry Association, to Ed Hall and Mary Madigan, Co-Chairs, Wireless TTY Forum, Sept. 8, 1998. Attached to October Quarterly Status Report as Appendix Q.

Criteria Document shall meet at a mutually agreeable time to address the criteria in the context of CTIA's inter-disciplinary approach to accessibility under Section 255.

Goals and Target Date

Meeting to be held on a mutually agreeable date but no later than December 15, 1998.

B. September 1998 Consumer Memo

On September 10, 1998, representatives of the consumer groups circulated a document to members of the TTY Forum outlining a new set of criteria to address only functional characteristics of any proposed solution for TTY access to digital wireless systems.⁵ In accordance with the FCC's Extension Order, the TTY Forum shall consider whether the criteria set forth in the September 1998 Consumer Memo is supported in the proposed voice-based and data-based solutions set forth in this Workplan. Consideration of the criteria shall be documented in a matrix of proposed technical solutions.

Goals and Target Date

- ◇ Develop matrix of proposed technical solutions - **Task completed**
- ◇ Finalize matrix (Task Force Members) - **Task Completed**
- ◇ Submit matrix with Workplan to FCC - **10/30/98**

III. Performance Standards for TTY Devices

Over the past several months, there has been significant discussion concerning the lack of uniform performance standards among TTY devices. Manufacturers of wireless handsets have indicated that such standards are critical in trying to address the technical challenges of voice-based solutions, including passing the Baudot signal of a TTY device over a digital air interface without any modification to the handset or the TTY device. The TTY Forum also discussed the need for a list of "most often used" TTY devices and specifications for each device if TTY

⁵ Memorandum from Consumer Representatives to TTY Forum, Sept. 10, 1998. Attached to October Quarterly Status Report as Appendix R.

The FCC's Wireless Telecommunications Bureau has elevated the new list of criteria by attaching it to the Extension Order as an appendix and holding it out as an example of what consumer groups would like to have incorporated into any solution implemented by the Forum, and therefore the workplan. See Extension Order at 4.

Direct Audio Connection

It appears that coupling via a direct audio connection between the TTY device and a digital wireless handset, *i.e.*, a 2.5 mm audio interface, is a preferred voice-based solution for some wireless carriers. A proposal for a wireless phone 2.5mm audio interface to TTY devices has been submitted to the TTY Forum.⁷ The proposal noted that audio output and input levels are different for each make and model phone. Thus, manufacturers of wireless phones would need to provide a special adapter with standard levels. Moreover, audio output and input levels of TTY devices have yet to be defined. The proposal recommended a "common interface" to resolve the variance in output and input levels.⁸ While the TTY Forum has reviewed a draft Technical Information Document ("TID"), the TID will be finalized at TTY Forum-9 and will be distributed to manufacturers and carriers shortly thereafter.

Acoustic Solution

Ericsson has indicated that it plans to pursue this option. Due to the confidential nature of Ericsson's marketing plans for this option, the TTY Forum recommends that the FCC meets with the manufacturer under confidentiality to discuss specific implementation plans and scheduled milestones.

RJ-11-type Modular Connection/Jack (Analog Solution)

The TTY Forum has discussed this option and does not consider it to be a viable short-term solution. Thus, the Forum has not pursued development or implementation of this option.

True RJ-11 Connection

The TTY Forum has discussed this option and does not consider it to be a viable short-term solution. Thus, the Forum has not pursued development or implementation of this option.

Proprietary Solutions

Several proprietary solutions such as the Mobility™ TTY, an enhanced TTY device developed by Lober & Walsh Engineering, the AxCell Interface Device developed by Sendele Wireless Communications and the RangeStar™ Technology developed by RangeStar International, have

⁷ See Proposed - Wireless Phone 2.5mm Audio Interface to TTY/TDD ("2.5mm Audio Interface Proposal"). Attached to October Quarterly Status Report as Appendix K.

⁸ See 2.5mm Audio Interface Proposal at 3-4. Attached to October Quarterly Status Report as Appendix K.

been presented to the TTY Forum for consideration as solutions. Due to the proprietary nature of these solutions, the TTY Forum has not been privy to how soon these products will be made commercially available. The TTY Forum recommends that the FCC meets with each company separately and under confidentiality to discuss specific implementation plans and scheduled milestones.

B. Proposed Data-Based Solutions (Circuit-Switched)

The proposed data-based solutions include Inter-Working Function solutions, Third Party Gateway and Proprietary Data-based solutions.

Inter-Working Function Solutions

These solutions rely on the development and installation of the appropriate inter-working function (IWF) software into a wireless carrier's network infrastructure. There are at least two proposed IWF solutions: the V.18 standard and proprietary TTY modems. While the standards for GSM, TDMA, iDEN and CDMA support the IWF functionality, minor modifications are necessary for TTY applications. Implementation of IWF solutions requires completion of product development and deployment, including billing capabilities for data, installation of TTY software in the subscriber terminal, installation of the IWF infrastructure which may be installed per switch or shared among a carrier's switches. In addition, V.18 capable modems need to be manufactured for use in the United States. The estimated timeframes set forth in the Matrix are contingent upon several factors: availability of modems incorporating V.18 standard or other enhanced protocols; timely resolution of any unanticipated technical glitches in product development and deployment as well as installation of the IWF infrastructure; and the availability of the appropriate engineering staff.

Third-Party Gateway Solution

Another proposed data-based solution is a Third Party Gateway Solution which is a solution using the Inter-working function (IWF) but it need not be installed in every carrier's network. A third party vendor would supply a number for a TTY user to call into and then complete the call to a landline TTY using the IWF. This is a very recent proposed solution and has not been fully explored by any members of the TTY Forum. The TTY Forum will discuss at TTY Forum – 9 whether to support this proposed data-based solution.

Proprietary Data-based Solutions

To be reviewed at future TTY Forums.

- V. Notification to Subscribers and Potential Subscribers who use TTYs**
In compliance with the FCC's rules, wireless carriers have notified subscribers and potential subscribers that they may not be able to use TTYs to access 9-1-1 over digital wireless systems. Wireless carriers, with the support of the wireless trade associations, the consumer advocacy groups, TTY manufacturers and wireless handset manufacturers, will continue to notify subscribers and potential subscribers at appropriate intervals until a product is commercially available.

Goals and Target Date

On-going until product is commercially available.

APPENDIX C

SOLUTIONS MATRIX AND WORKPLAN

Task Force Members to Complete the Data Base Solutions Matrix:

- Todd Lantor
- Norm Williams
- Judy Harkins
- Ron Schultz
- Nikolai Leung
- Mohamed El-Rayes
- UWCC member
- Steve Coston
- John Suprock
- Brye Bonner

Group is empowered to complete matrix below on behalf of the TTY Forum.

Proposed Solution	Testing/Implementation	Advantages/Disadvantages	Consumer Requirements	Milestones
		<ul style="list-style-type: none"> • Landlines TTY do not need to be modified. <p>Disadvantages</p> <ul style="list-style-type: none"> • Expensive to operate and maintain. 	<ul style="list-style-type: none"> 2. Not Supported 3. Not Supported 4. Supported 5. TBD 6. Supported 7. Supported 8. Supported 9. TBD 10. N/A 11. Not Supported 12. Supported 13. TBD 	not been fully explored by any members of the TTY Forum.
<i>Proprietary</i>	Unknown	Unknown	Unknown	Unknown FCC can meet with stakeholders

*V.18 Letter to modem manufacturers will be drafted by Dick Brandt under the TTY Forum letterhead requesting support for TTY issue.

PROPOSED DATA-BASED SOLUTIONS - Circuit-Switched

Proposed Solution	Testing/Implementation	Advantages/Disadvantages	Consumer Requirements	Milestones
<p>Inter-Working Function (IWF):</p> <ul style="list-style-type: none"> • V.18 (Baudot) • Proprietary TTY Modem 	<ul style="list-style-type: none"> • Complete Data SRD • CDMA existing IS-707 • TDMA existing IS-135 • Standards Modifications TBD based on SRD. • Test with existing TTYs for both inbound and outbound calls. • Test with PSAP, existing TTY using existing standards 	<p>Advantages:</p> <ul style="list-style-type: none"> • Reliable Communications, as good as wireline. • World-wide Standard • Requires little or no modifications to existing TTY • Could support more platforms, TTYs, PDAs, and Laptops. <p>Disadvantages:</p> <ul style="list-style-type: none"> • Not all Carriers may choose to implement data services. • Compatible with all current Baudot standards, except Ultratec's Turbocode. • Require mobile connection interface to existing TTYs. • IWF do not support VCO • IWF with Baudot not commercially available 	<ol style="list-style-type: none"> 1. Supported 2. TBD 3. TBD 4. N/A 5. TBD 6. Supported 7. Supported 8. Supported 9. Not Supported 10. Supported 11. TBD 12. Supported 13. Supported 	<ul style="list-style-type: none"> • Est. Timetable 12-18 months • Implement Baudot/V.18 in the IWF • Widespread deployment of the IWF • Update handsets to support data service.
<p><i>3rd Party Gateway</i></p>		<p>Advantages:</p>	<ol style="list-style-type: none"> 1. TBD 	<p>This option has</p>

Proposed Solution	Testing/Implementation	Advantages/Disadvantages	Consumer Requirements Supported	Milestones
		services.		

Proposed Solution	Testing/Implementation	Advantages/Disadvantages	Consumer Requirements Supported	Milestones
		<p>functions (may require separate device for HCO/VCO)</p> <ul style="list-style-type: none"> • Requires additional power supply • Expensive • Bulky 	<p>11. N/A 12. N/A 13. N/A</p>	
<i>Vocoder Modifications</i>		<p>Not cost effective</p> <p>No modification to TTY</p> <p>Using Full rate</p> <p>Extensive international standards development and implementation process.</p> <p>Could provide more reliable CER</p> <p>Potential to degrade voice quality.</p> <p>Error detection and correction would be lower for a data tone call compared to data</p>	<p>1. TBD 2. Supported 3. Supported 4. Supported 5. TBD 6. Supported 7. Supported 8. Supported 9. TBD 10. Supported 11. Supported 12. TBD 13. TBD</p>	<ul style="list-style-type: none"> • Develop new standard. • Test new standard for baudot and voice.

Proposed Solution	Testing/Implementation	Advantages/Disadvantages	Consumer Requirements Supported	Milestones
		to standardize landline handsets Disadvantages: <ul style="list-style-type: none"> • Highly susceptible to background noise • Bulky – requires a landline handset and cable 	13. N/A	
<i>Proprietary</i> <ul style="list-style-type: none"> • Phone Products • Terminals 	Unknown	Unknown	Unknown	Unknown FCC can meet with stakeholders
<i>True RJ-11 Connection</i>	<ol style="list-style-type: none"> 1. Develop Technical Information Document, 2. SRD, 3. Develop Standard 4. Notify TTY Phone Manufacturers 	Advantages: <ul style="list-style-type: none"> • Supports full functionality • Support some of the embedded base of TTYs Disadvantages: <ul style="list-style-type: none"> • Physical size • Cannot use handset for VCO 	<ol style="list-style-type: none"> 1. Preferred over acoustic 2. Supported 3. Supported 4. Not Supported 5. TBD 6. Supported 7. Supported 8. Supported 9. Supported 10. N/A 	This option is not considered a short-term solution by the Forum and therefore is not being pursued by this Forum at this time.

Proposed Solution	Testing/Implementation	Advantages/Disadvantages	Consumer Requirements Supported	Milestones
<p><i>Jack</i> (Analog Solution)</p>	<p>Document, 6. SRD, 7. Develop Standard 8. Notify TTY Phone Manufacturers</p>	<p>functionality</p> <ul style="list-style-type: none"> • Could support some of the embedded base of TTYs <p>Disadvantages:</p> <ul style="list-style-type: none"> • Physical size • Cannot use handset for VCO functions (may require separate device for HCO/VCO) 	<p>2. Supported 3. Supported 4. Supported 5. TBD 6. Supported 7. Supported 8. Supported 9. Supported 10. N/A 11. N/A 12. N/A 13. N/A</p>	<p>is not being pursued by this Forum at this time.</p>
<p><i>Acoustic solution</i> – use of external landline handset</p>	<p>1. No Standardization required</p>	<p>Advantages:</p> <ul style="list-style-type: none"> • No standardization required • Supports most embedded base of TTYs • Very Low interface cost • Short development cycle • Easily accessible 	<p>1. Could negatively impact CER 2. Supported 3. Supported 4. Supported 5. TBD 6. Supported 7. Supported 8. Supported 9. Supported 10. N/A 11. N/A 12. N/A</p>	<p>TBD by manufacturer</p>

PROPOSED VOICE-BASED SOLUTIONS (Passing Baudot signal through the VOCODER)

Proposed Solution	Testing/ Implementation	Advantages/ Disadvantages	Consumer Requirements Supported	Milestones
<p><i>Direct Audio Connection</i> (2.5 mm Jack – Preferred Method)</p>	<ol style="list-style-type: none"> 1. Finalize Technical Information Document, 2. SRD, 3. Develop Standard, SDO 4. Notify TTY Phone Manufacturers 	<p>Advantages:</p> <ul style="list-style-type: none"> • Cost effective • Small in size • Rapid to implement • High Immunity to interference • Recognized industry connector • Does not require additional power supply • May allow connection to other devices <p>Disadvantages:</p> <ul style="list-style-type: none"> • Requires modification/ adapter to TTY • Yields no inherent improvement to CER • Supports only limited features 	<ol style="list-style-type: none"> 1. Preferred over acoustic 2. Supported 3. Supported 4. Supported 5. TBD 6. Supported 7. Supported 8. Supported 9. Supported 10. N/A 11. N/A 12. N/A 13. N/A 	<ol style="list-style-type: none"> 1. Nov 1998 2. Submit to TR45.1 – (Ericsson liaison) date TBD 3. Ericsson to identify timetable with TR45.1 – actual date to be posted on listserve 4. TBD by #3
<p><i>RJ11-type Modular Connection/</i></p>	<ol style="list-style-type: none"> 5. Develop Technical Information 	<p>Advantages:</p> <ul style="list-style-type: none"> • Could support full 	<ol style="list-style-type: none"> 1. Preferred over acoustic 	<p>This option is not considered a short-term solution by the Forum and therefore</p>

STANDARD TEST PROCEDURE

In order to meet the requirements of the FCC's October 30, 1998, deadline, the TTY Forum with the assistance of the wireless digital technology groups¹ developed and are finalizing a uniform test methodology ("Test Procedure") to compare character error rates technology by technology (CDMA, TDMA, GSM 1900, iDEN). The TTY Forum has developed four (4) separate documents that are specific to these individual technologies addressed, yet are equivalent in methodology and procedural guidelines necessary to record comparable test results within each technology. These documents are considered "living" documents and are subject to modifications upon initiating the Test Plan (s) described.

While the intent of these documents are to provide uniform test guidelines whereby achieving comparable test results for all technologies, the TTY Forum clearly understands that there are differences within each technology. Therefore, all proposals for change will be reviewed to ensure that the documents do not lose the intended "standardization" between technologies for which they were developed. Attached are the Test Procedure documents representing wireless technologies TDMA, iDEN, and GSM 1900.²

Below is a list of testing facilities, recommended dates, as provided by each wireless digital technology group.

GSMNA

Ericsson Facility

Cetecom Facility

Nokia Type Approval Center

GSM NA plans to commence testing as soon as possible with a target date of January 1999 to provide test results to the TTY Forum and the FCC, provided that the following are true: 1) the test specification with modifications suggested by the GSM NA is approved and released by October 30, 1998; 2) lab based testing with real world conditions is accepted; 3) the test specification does not change dramatically; 4) manufacturers can assist the test facilities to set up the test; and 5) no unforeseen restrictions are placed on the testing.

¹ For purposes of the Workplan, wireless digital technology groups means the CDMA Development Group ("CDG"), GSM North America, and Universal Wireless Communications Consortium ("UWC Consortium").

² The CDG did not submit any modifications to the Test Procedure by the October 30, 1998, filing date. The TTY Forum assumes the CDG will submit its modifications directly to the FCC for review.

CDG

Sprint

No information provided on availability of test facility.

UWCC

No information provided on test facility or availability.

IDEN

No information provided regarding test facility or availability.