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EX PARTE OR LATE FILED



July 9, 1999

Ms. Magalie Roman Salas  
Secretary  
Federal Communications Commission  
445 - 12<sup>th</sup> Street, SW  
Room: TW-A325  
Washington, DC 20554

RECEIVED

JUL 9 1999

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

Re: WT Docket No. 96-198

Dear Ms. Salas:

In separate meetings held on July 7, 1999, the undersigned met with Dan Connors, legal advisor to Commissioner Ness, and Dorothy Atwood, legal advisor to Chairman Kennard, to discuss the Commission's proceeding implementing Section 255 of the Telecommunications Act. Bell Atlantic supports accessibility for all Americans, including those with disabilities. In implementing Congress' accessibility objectives, the Commission should ensure that its rules do not stifle innovation and are applied in a competitively neutral manner. A summary of issues discussed in the meeting is attached.

Due to an administrative error, this notice is being filed late. Please include a copy of this ex parte presentation in the record for the above captioned proceeding. If you have any questions, you may call me on (202) 336-7873.

Attachment

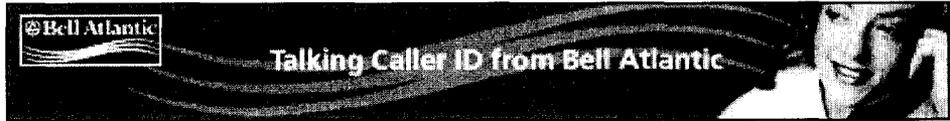
cc: D. Atwood  
D. Connors

No. of Copies rec'd 041  
List A B C D E

**Implementation of Section 255 of the Telecom Act of 1996**  
**“Access to Telecommunications Equipment and Services**  
**by Persons with Disabilities”**

**Bell Atlantic Ex Parte of July 7, 1999**

- The Commission can best implement Congress’s vision by creating a flexible regulatory approach that:
  - (1) gives the industry latitude to meet the mandates of Section 255 in a manner that will serve the needs of all customers for innovative products and services without unnecessary intrusive regulation;
  - (2) affords consumers a process for resolving accessibility problems in a way that places minimal regulatory burdens on consumers, industry and the Commission; and
  - (3) assists industry in working with the disabled community to find common solutions to broad-based accessibility issues.
  
- **The Commission must not impose regulations that will stifle innovation.**
  
- The Commission should supplement and interpret the Access Board’s guidelines as needed to assist parties in resolving accessibility problems.
  - Section 255 applies to “telecommunications services” as the Commission has already defined such services.
  - The Commission is correct in proposing a definition for “readily achievable” that includes factors such as technical feasibility, expense, and the practicality of making the product accessible (e.g., effects on marketability, company resources, etc.).
  - Only the resources of the entity offering the product or service should be considered in making determinations about what resources are available for providing accessibility.
  - The Commission and the TAAC correctly recognize that full accessibility may be limited by feasibility, expense, or practicality. Employing a “product line” approach in many cases would increase overall accessibility.



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### AccessAbility

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### Universal Design Principles

- Provide quality services that can reasonably accommodate a broad range of diverse users including youth, individuals with disabilities and seniors.
- Review existing services to determine which services should be made more accessible.
- Design and develop services, to the extent readily achievable, to be accessible to a broad range of users.
- Market and provision services in a manner consistent with Universal Design.
- Employ these Universal Design Principles Bell Atlantic-wide in relationships with customers, employees, shareholders and suppliers. Bell Atlantic will encourage companies related to - but not controlled by - Bell Atlantic to adopt these Principles.

#### Contact Us at:

Bell Atlantic Center for Customers with Disabilities  
 280 Locke Drive, Fourth Floor  
 Marlboro, Massachusetts 01752  
 1-800-974-6006 V/TTY  
 1-508-624-7645 FAX  
 E-mail: [baccd@bellatlantic.com](mailto:baccd@bellatlantic.com)  
 Hours: Monday - Friday, 8:30 am -

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