

## Response to Proposed Rules

**Question 27:** The Board seeks information from pay telephone manufacturers and providers on the time frame necessary to produce products that meet the proposed specifications for volume control.

**Response:** It doesn't appear that they are looking for consumer input here but, here are my thoughts anyway.

SHHH did recommend an increase in the level of volume control from 18 to 20 dB. The proposed rules require a volume gain up to at least 20 dB with automatic reset. SHHH also recommended that all phones have volume control as hearing people using these phones in noisy places could benefit as well. However, the scoping remains at 25%. The DOD could still request that all phones have volume control.

We could emphasize signage again if less than 100% have volume control.

Since it is stated that reaching a gain of 25 dB is not a problem for current telephone technology, it doesn't seem a long period of time is needed to bring this about. Would it be realistic to think this could be phased in over a 2-year period of time...or less, even?

It does seem to be a waste of resources to me that if they have already had input that 25 dB is helpful to some HOH people, that they would monitor this and make changes later. Why not do it at this time?

**Question 28:** Mute features on public pay telephones can increase audibility by temporarily disconnecting the telephone's microphone while the user listens through the earpiece so that background noise is not amplified through the earpiece. The Board seeks information on the feasibility and cost of equipping new and existing public pay telephones with a mute button. Comment is sought on whether such a requirement should be included in the final rule.

**Response:** A mute button should be required. People who do not use the phone with a T-coil would definitely benefit from this feature. Using the T-coil does help but still the amplification of background noise through the phone receiver does cause interference. This feature would benefit all people using pay phones and not just people with hearing loss.

**Question 30:** Comment is sought on the appropriateness of these criteria for assistive listening systems and their inclusion as technical requirements in the revised guidelines. Specifications based on these criteria may be included in the final rule.

**Response:** We should definitely support the requirement that receivers have 1/8-inch standard mono jack so that users can use their own cabling as necessary. While cabling should be provided, it is conceivable that the cabling of choice is being used by others and being able to access the equipment with one's own cabling preference is a definite advantage.

I cannot express my support loud enough that there be neckloops made available for people with T-coils. I do question if 25% will be a sufficient requirement in time as T-coils are becoming more common and more and more people hopefully will begin to access assistive listening devices. I would recommend that we suggest that 50% of cabling devices be neckloops with the hopes that we would get that number or at least somewhere between 25 & 50%. If the 6 of us HOH people who were at the meeting held here last Friday afternoon, had gone to a movie or play together after our meeting, all 6 of us would have wanted a neckloop.

I also cannot stress strongly enough the need for some kind of standard for performance of ALDs. In many situations, i.e., local movie theaters, the Breslin Center and Wharton Center, I am still discriminated against because devices available at these venues only provide amplification sufficient for someone with mild to moderate hearing loss. I suggest we request that standardization include amplification that benefits people with severe and profound hearing loss as well as those with mild to moderate hearing loss.

Regarding the Removal of Fixed Seating Requirement...I am going to paste here comments from the SHHH website.

This requirement in the original ADA was confusing and left out coverage for many facilities with movable chairs. The new rules would expand coverage to all assembly areas where communication is integral to the use of the space, providing an amplification system is in use. SHHH supports removing the fixed seating requirement but believes that all assembly areas should be covered even if no audio amplification system is in place. Otherwise library meeting

rooms, senior center classrooms and auditoriums will be excluded because they often do not have an audio system installed.

**Question 33:** Relates to ATM machines –

**Response:** Under 707.5.5 – Reference is made to the use of a telephone handset. If persons using hearing aids use handsets they will need to be hearing aid compatible and have volume control. It is too bad that people would have to provide their own cabling equipment but probably very necessary as anything that might be made available would most likely be ripped off.

This section also requires provision of options for receipts in print, audible format, or both (707.5.8.) Will people requesting a print out because they cannot hear the audible response be required to pay for the print out? Will audio responses be free?

**Question 34:** Seeks comment on audio output receivers for accessing audible output at ATM machines. Seeks to know if customers would or currently do carry receivers or if they view providing their own receivers as an unreasonable expectation.

**Response:** To expect customers to carry their own receivers is definitely an unreasonable expectation. Since several options in receivers exist, audio output would have to be compatible with the many types of receivers. However, any type of quality receiver is costly and the expense of hearing aids prohibits many people from purchasing their own assistive listening receivers. The option would be to not use ATM machines thus limiting access.

**Question 36:** Seeks comments on various options for providing captioning that would best facilitate effective communication at movie theaters.

**Response:** SHHH has learned through an informal survey of some of its members that open captioning is by far the preferred method for viewing movies to date. There are numerous complaints about rear window. I suggest we support open captioning until better technology is developed and that we request that all movies be captioned at the time of production and be made accessible by being shown in the same way that uncaptioned movies are shown today – soon following release, same times and frequency.

**Question 37:** Should the board require that convenience food drive through facilities provide accessible communications. Should an ATM type machine be substituted for voice communication systems currently used?

**Response:** Using current drive through fast food places that display my order and the cost of my purchase on a screen is very helpful. It is so difficult to understand voices asking for and repeating your order if you are hard of hearing (and, of course, impossible for people who are deaf). A noisy vehicle in front or behind your car, a windy day or a busy location with lots of environmental noise can make using the drive through window very difficult. I suggest we request that questions related to one's order also show on the screen. Push buttons like those used with an ATM machine would be helpful.

**Question 45:** Should equivalent means of communication be applied to facilities other than transportation facilities.

Yes. Hard of hearing and deaf people miss out totally on announcements as well as half time presentations at sporting events at the high school, college and professional levels. With the types of scoring screens and cameras constantly spanning the crowd as well as the play on field, court or ice, at collegiate and professional levels this would not be difficult to do. I do not have recommendations for making this happen at the high school level.

I am trying to think of other places where this is needed?

Chris, some of my responses are not in a format that is usable for sending to the Access Board. I will do that for you if you would like. Let me know if there is more you would like me to do to respond to these rules. – Ann