



THE COUNCIL OF ORGANIZATIONAL REPRESENTATIVES
ON NATIONAL ISSUES CONCERNING PEOPLE WHO ARE DEAF OR HARD OF HEARING

July 26, 2001

Margie Roman Salas
Office of the Secretary
Federal Communications Commission
445 12th Street, S.W., TW-A325
Washington, DC 20554

Re: CC Docket No. 94-102, Comment sought on E911 Phase II Waiver Request
filed by CORR Wireless Communications, LLC

Dear Secretary Salas :

The members of the Council of Organizational Representatives on National Issues Concerning People who are Deaf or Hard of Hearing (COR)¹ strongly oppose any proposed waiver of the Commission's Phase II rules which would delay the implementation of Phase II service by up to eighteen months, and would prevent Public Safety Answering Points from learning the precise location of wireless 911 calls.

COR is a coalition of national organizations committed to improving the lives of individuals who are deaf or hard of hearing. Constituencies of COR organizations provide a variety of services, including technological and telecommunications services; educational programs; medical, audiological, and speech-language pathology assessment and rehabilitation services; information on assistive devices and technology; and general information on other services for deaf and hard of hearing consumers. Among other things, COR serves as a bridge among interested organizations, the general public and the community of people with disabilities on matters concerning deaf or hard of hearing individuals.

Although the forces of the open market may frequently operate to provide improved services to consumers, thus making regulations superfluous, this has not been true in the case of deaf or hard of hearing consumers and their access to the ongoing telecommunications revolution. Despite the fact that digital wireless service has been widely available for over six years, the telecommunications industry has failed to provide accessible digital wireless telephone service to persons using hearing aids, cochlear implants, assistive listening devices or TTYs. Deaf and hard of hearing

¹ The following organizations of COR support this position: Alexander Graham Bell Association for the Deaf and Hard of Hearing, American Speech-Language-Hearing Association, CPB/WGBH National Center for Accessible Media, Convention of American Instructors of the Deaf, National Court Reporters Association, Registry of Interpreters for the Deaf, Self Help For Hard of Hearing People, The League for the Hard of Hearing, and TDI.

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consumers are being excluded from telecommunications services. In this instance, the original report and order requiring compatibility with Enhanced 911 Emergency Calling Systems was issued in 1996.² If the interests and access of people with hearing loss to telecommunications are to be safeguarded, the FCC must regulate the provision of wireless 911 calls and ensure that they are offered in a manner consistent with that used for wireline calls.

For all the above reasons, COR strongly opposes any proposed waiver of the Commission's Phase II rules which would delay the implementation of Phase II service by up to eighteen months, and would prevent Public Safety Answering Points from learning the precise location of wireless 911 calls.

Respectfully submitted,



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² 47 C.F.R. §20.18. See Revision of the Commission's Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems, CC Docket No. 94-102, Report and Order and further Notice of Proposed Rulemaking, 11 FCC Rcd 18676 (1996).