



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

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August 1, 2001

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

Re: Reply Comments in WT Docket No. 01-108, In the Matter of Year 2000  
Biennial Regulatory Review –Notice of Proposed Rulemaking

Dear Secretary Salas:

The members of the Council of Organizational Representatives on National Issues Concerning People who are Deaf or Hard of Hearing (COR), by and through the undersigned co-chairs, submit these reply comments in the above-captioned matter.

We note that none of the comments submitted in this matter by industry, individuals and organizations devoted to the needs of people with hearing loss, presented any compelling reasons to support a modification or elimination of the analog telephone service requirement or the mandatory analog compatibility standard. Further, we believe that the majority of the comments of industry, predicated as they were on tentative promises of potential digital accessibility for wireless telephones, with no foreseeable implementation date, are inadequate to demonstrate any current realistic expectation of access of consumers with hearing loss to current digital wireless technology. It is clear that the removal of the analog telephone service requirement or the analog mandatory compatibility standard would devastate the ability of consumers who are deaf or hard of hearing to gain and maintain access to mobile telecommunications.

COR believes that the comments of the wireless industry consisted entirely of qualified commitments and unsubstantiated hopes. Given the failure of the industry over six years to voluntarily produce consistently accessible wireless phones for people who are deaf and hard of hearing, we believe that these expectations are inadequate. The members of COR appreciate the benefits offered by digital wireless networks and wish to have access to digital wireless service. However, the hope for digital service, without a means of access, is in adequate compensation for consumers who would be left without the safe harbor of analog cellular phones.

Secretary Margie Roman Salas  
July 2, 2001

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The comments offered on this proposed rulemaking do not demonstrate that the interest of the entire public would be served by the proposed changes. COR agrees with the observation of Rural Telecommunications Group<sup>1</sup>, that “the overwhelming majority of commenters supported keeping cellular analog compatibility requirements for at least five more years. Analog is the de facto roaming standard for cellular and is used for a wealth of vehicle tracking services as well as by disabled wireless equipment users.” The Rural Cellular Association<sup>2</sup> also noted that “elimination of the rule requiring cellular carriers to provide analog services would destroy ‘seamless’ roaming.” Deere & Company noted that the many urban and rural customers of its DeereTrax™ device would be “substantially harmed if the analog compatibility standard was eliminated and carriers were allowed to stop providing AMPS analog service.”<sup>3</sup>

If the interests and access of people with hearing loss to telecommunications are to be safeguarded, the FCC must regulate the provision of accessible analog service and ensure that it continues to be offered as a means of providing access to telecommunications. COR strongly opposes any proposed modification or elimination of the analog telephone service requirement or the mandatory analog compatibility standard. Analog cellular phone service must remain, with explicit Federal Regulation protecting the rights of all consumers until proven accessible digital telephone service is available and used by all consumers, including those who are deaf and hard of hearing.

Respectfully submitted,



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<sup>1</sup> Reply Comments of Rural Telecommunications Group, July 11, 2001, at 2.

<sup>2</sup> Comments of Rural Cellular Group, July 2, 2001, at 2.

<sup>3</sup> Comments of Deere & Company, July 2, 2001, at 5.