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ATTORNEYS AT LAW

October 22, 2003

Ex Parte – Via Electronic Filing

Ms. Marlene Dortch, Secretary
Federal Communications Commission
The Portals
445 Twelfth Street, S.W.
Washington, DC 20554

Re: WT Docket No. 01-309, RM-8658
*In the Matter of Section 68.4(a) of the Commission's Rules Governing
Hearing Aid-Compatible Telephones*

CC Docket No. 98-67; CG Docket No. 03-123
*In the Matter of Telecommunication Relay Service and Speech-to-Speech
Services for Individuals with Hearing and Speech Disabilities*

Dear Ms. Dortch:

On October 21, 2003, Cindy Manheim and Lisa Volpe, both of AT&T Wireless Services, Inc. (AWS) and I met with the following Commission staff from the Disabilities Rights Office: Tom Chandler, Cheryl King, Greg Hlibok, Sean O'Moore and Jenifer Simpson. The purpose of the meeting was to provide the staff with background on AWS's outreach and education concerning disabilities access to AWS's products and services, as well as to provide feedback on AWS's experiences implementing its internal Section 255 accessibility review program.

In addition, we briefly discussed two issues related to open proceedings. First, AWS indicated its support for the requested reconsideration or clarification of the *de minimis* exception to the recently adopted RF interference and inductive coupling requirements for wireless handsets. In petitions for reconsideration filed on October 16, 2003 in WT Docket No. 01-309, Research in Motion (RIM) and the Cellular Telecommunications and Internet Association (CTIA) discuss significant practical difficulties that would arise were the rule interpreted to apply to a carrier's or manufacturer's total sales activity, rather than on an air-interface specific basis. AWS believes that the Commission had intended the rule to apply per air interface, and accordingly believes that the Commission needs simply to provide clarification of this point.

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AWS also discussed its view that requiring wireless carriers to transmit location information to Telecommunications Relay Service (TRS) Centers (and the TRS Centers, in turn, to forward that information to the answering Public Safety Answering Point (PSAP)) for emergency calls is not only unnecessary, but also unwise. (*See generally* Comments of AT&T Wireless Services, Inc., CG Docket No. 03-123, CC Docket No. 98-67, filed September 24, 2003.) Under the Americans with Disabilities Act, individuals who use TTYs are entitled to *direct access* to 911 services, and the Department of Justice has so ruled. More important than the extensive cost of implementing such capabilities in the TRS Centers – costs that would be borne by the public – is the fact that doing so would actually *encourage* TTY-users to access emergency services in a manner than is indirect, more susceptible to error, and takes more time. None of this is desirable in an emergency situation. AWS believes that the Commission's efforts would be better spent on additional education about TRS services (as many commenters support) and ensuring that PSAPs have the resources necessary to meet their obligations under the law.

In accordance with Section 1.1206(b)(1) of the Commission's rules, a copy of this letter is being filed in the above-captioned dockets.

Respectfully submitted,



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