



Toni Acton
Director -
Federal Regulatory

AT&T Services, Inc.
1120 20th Street, NW.
Suite 1000
Washington, D.C. 20036
Phone: 202 457-3039
Fax: 202 457-3070

December 21, 2007

Via Electronic Submission

Ms. Marlene Dortch
Secretary
Federal Communications Commission
445 Twelfth Street, SW
Washington, DC 20554

Re: WC Docket No. 06-74, In the Matter of AT&T Inc. and BellSouth Corporation
Application for Transfer of Control – **Report of AT&T's Efforts to Provide High
Quality Service to its Customers with Disabilities**

Dear Ms. Dortch:

In accordance with the voluntary commitments set forth in Appendix F of the Commission's Memorandum Opinion and Order in WC Docket No. 06-74, In the Matter of AT&T Inc. and BellSouth Corporation Application for Transfer of Control, attached please find AT&T's report describing its efforts to provide high quality service to its customers with disabilities.

If you have any questions regarding the attached, please contact the undersigned at (202) 457-3039

Sincerely,

/s/Toni R. Acton

Attachment

cc: The Honorable Kevin J. Martin
The Honorable Jonathan S. Adelstein
The Honorable Michael J. Copps
The Honorable Robert M. McDowell
The Honorable Deborah Taylor Tate
Cathy Seidel
Thomas Chandler

AT&T's Service to Its Customers With Disabilities

Introduction

AT&T believes that to live fully in the Information Age, people with disabilities have to be able to use telecommunications products and services. In our wired (and increasingly wireless) world, nearly all of us are heavily reliant on our communications devices and networks to conduct commerce, to educate and inform each other, and to stay connected to family and friends. These are essential functions for all Americans, but Americans with disabilities can derive particular benefits from these technologies – and they are dramatically disadvantaged when they are denied access to them.

Regulatory Framework

The Telecommunications Act of 1996, which completely overhauled regulation of the telecommunications industry, requires telecommunications companies to ensure that their services are accessible to people with disabilities, where readily achievable. Section 255 of the Telecommunications Act was the culmination of more than a decade of federal lawmaking designed to bring the benefits of communications technology to people with disabilities.

Significant legislation prior to Section 255 included:

- Telecommunications for the Disabled Act of 1982 - allows states to require carriers to continue providing subsidies for specialized equipment needed by persons with impaired hearing, speech, vision, or mobility. It also mandates that certain telephones be compatible with hearing aids.

- Section 508 of the 1986 Amendments to the Rehabilitation Act - directs federal government agencies to limit their purchases to information technology that is accessible or could support accessibility.
- Title I of the Technology Related Assistance for Individuals with Disabilities Act of 1988 - establishes federal grants to help states increase access to assistive technology and accessible information technology.
- Hearing Aid Compatibility Act (HAC Act) - requires all landline telephones (with the exception of secure telephones) made in or imported into the United States after a certain date be hearing aid compatible.
- Telecommunications Access Enhancement Act of 1988 - establishes expanded federal relay services for calls to, from, and within the federal government, and is designed to improve telecommunications access for persons using a teletypewriter (TTY) service.
- Americans with Disabilities Act (ADA), July 1990 - first comprehensive civil rights law to prohibit discrimination against persons with disabilities in employment, state and local government programs, places of public accommodation, transportation, and telecommunications. Title IV of the ADA mandates the establishment of a nationwide telecommunications relay service by 1993.

AT&T - A Telephone Pioneer

Alexander Graham Bell, the inventor of the telephone and the founder of the company that would become AT&T, was a teacher of the deaf. His father, grandfather and brother all studied elocution and speech, and both his mother and his wife were deaf. All of this exerted a profound influence on Bell. In fact, Bell's invention of the telephone in 1876 grew out of his efforts to devise the first hearing aid.

In 1871, Bell began teaching at the Boston School for Deaf Mutes. Bell's work with his deaf students in Boston would prove to be a watershed event in his life as the parents of some of his students were so grateful to Bell for his efforts to help their children that they became the primary financial backers of the electrical experiments that Bell was conducting after work. These experiments led directly to the invention of the telephone.

Bell's dedication to helping people with disabilities set the tone for the company he founded. For example, Bell Telephone Laboratories and Western Electric, the manufacturing arm of AT&T between 1881 and 1995, were pioneers in the development of the first hearing aids. In 1924, researchers at Bell Labs invented the "Artificial Larynx," which restored the power of speech to people unable to use their vocal cords. A decade later, Bell Labs and Western Electric introduced the "Group Audiphone," a system that used a microphone and headsets to help the hard-of-hearing in churches, schools and theaters. Also in the 1930's, Bell Labs and Western Electric introduced "audiometers," which were used to test the hearing of schoolchildren.

AT&T's innovations continued throughout the 20th century. In 1960, Bell Labs improved upon its original artificial larynx with an electronic version. The "Electronic

Larynx” could transmit vibrations through the flesh of the throat into the lower end of the vocal tract. The person using it could then form the vibrations into voiced sounds of speech by using the tongue, lips, and teeth, just as a normal talker would.

In 1963, Bell Labs designed special “seeing aid” equipment to enable visually impaired operators to serve regular telephone switchboards. A sensitive probe caused a buzz in the operator’s earphone when it passed over a lighted lamp. By moving the probe up and down a central row of lamps, the operator learned what level the call came in on and which side. The operator then used a probe to find the proper hole and went on to complete the call.

In the mid-1960s, Bell Labs knocked down an imposing barrier for deaf individuals when it invented an acoustic coupler that allowed teletypewriter signals to be sent and received through the telephone network. AT&T and others donated teletypewriters and the Telephone Pioneers, a volunteer organization of telecommunications workers, helped to spread the benefits of this technology in the deaf community.

Bell Labs made public pay phones more accessible in 1975 when it developed a new handset that emitted a harmless electromagnetic field that made the phone compatible with hearing aids. Around this time, AT&T also began producing customized equipment for people with disabilities, including on-hook/off-hook switches that could be controlled by light touch, puff and sip, and electronic environmental controls. It also introduced 24-hour operator services for hearing and speech-impaired customers using keyboard-type devices (TTY).

In the 1980s, AT&T participated in the initial efforts to establish telecommunications relay services (TRS), and worked with other companies to help states distribute telecommunications equipment to people with disabilities. This decade also saw groundbreaking research on speech recognition technology, which held great promise for people with vision and speech disabilities and paralysis. In 1987, AT&T launched the first public Telecommunications Device for the Deaf (TDD) relay service from an office in Woodland Hills, California. Customers with disabilities used TDD terminals to send typed messages to operators at the relay center, who then transmitted them to hearing users on regular phones. In the first month alone, this service handled 80,000 calls.

AT&T's Commitment to Individuals with Disabilities

AT&T has welcomed these advances, and it remains committed to bringing the benefits of telecommunications to all Americans, including those with disabilities. The company has a proud history of serving and employing people with disabilities. Its dedication to these goals is evident in its product development, customer service, employment, advertising and community activism.

In most of these arenas, AT&T is an industry leader when it comes to addressing the needs of people with disabilities. Just last year, for example, the company signaled its continued commitment by establishing the AT&T Advisory Panel on Access and Aging (AAPAA). The members of the panel have extensive experience advocating for people with disabilities and/or seniors. AAPAA members meet four times a year with AT&T decision makers to discuss emerging technology accessibility issues and to provide input regarding products and services, customer service, marketing and employment issues.

More than a decade ago, what is now AT&T Mobility created the Wireless Access Task Force which was charged with assessing the needs of customers with disabilities. The panel, composed of representatives from consumer groups and advocates for seniors and people with disabilities, met regularly with company officials to voice their opinions and to learn about the wireless business. Members also had the opportunity to meet with handset manufacturers. The task force helped the company develop a range of products and services, including TTY and hearing-aid compatible handsets, network-based voice dialing, and a range of devices that can be used by people with little or no vision. While the task force held its last meeting in September 2007, the knowledge and expertise developed in the past decade will continue through the members of the task force who serve on the AAPAA.

AT&T currently provides three types of Telecommunications Relay Services (“TRS”) to meet the communications needs of the more than 31 million Americans who have a hearing or speech loss. In 2006, AT&T handled 5.5 million calls as the designated provider for traditional TRS in Michigan, Maryland, Kansas, Virginia and Pennsylvania. Traditional TRS allows people with hearing and speech loss who use a TTY (text device) to communicate with a standard phone user via the Public Switch Telephone Network (“PSTN”). In 2007, when AT&T’s contracts in Maryland and Kansas were recompeted, these states selected another provider. AT&T hopes to expand the number of states where it is the designated relay provider as opportunities arise. In addition to traditional intrastate TRS, AT&T provides its own traditional interstate relay service which allows callers to use AT&T relay operators to complete interstate relay calls. In 2006, AT&T completed more than 2 million conversation minutes through its interstate service.

AT&T also offers Internet Protocol (“IP”) Relay Service, which allows people with hearing and speech loss to communicate with a standard telephone user by using a web-based device and an Internet browser. In 2006, AT&T handled 2.1 million Internet Relay calls. Additionally, through a subcontractor, AT&T provides Video Relay Service (“VRS”) which allows users to use sign language to communicate via the Internet to an interpreter who will then relay the call to a standard phone user. Thirty-three thousand calls were handled in 2006.

In 2006, AT&T began providing Captioned VCO Telephone Service (CTS) service, an emerging technology, to Michigan customers through an arrangement with another provider. As of September 30, 2007, 429 CapTelsm phones have been distributed to Michigan customers.

Wireline Products and Services

AT&T’s long history of serving people with disabilities starts with the development of products that are accessible to and usable by people with disabilities. Evaluating the accessibility of new products and services is a significant component of the wireline product development process. Consistent with the law, AT&T’s policy is that product teams must be familiar with Section 255 and Section 508 rules and apply them during product development. To help advance this goal, AT&T has developed tools to help product development teams evaluate the accessibility and usability of products. AT&T has accessibility checklists and guidelines for use in the product development process. One of the tasks on the standard project schedule is to identify “universal design requirements” using accessibility checklists. The information entered into the checklists becomes part of the official documentation of each project.

A “Human Factors” group within AT&T Labs tests many of the company’s designs to evaluate the accessibility of products and services. When appropriate, the team includes seniors and people with disabilities in these studies. AT&T Labs staff members have experience with accessibility issues and frequently participate in local accessible technology groups. They are recognized by their peers throughout the field for their expertise. For example, the Human Factors group helped develop the forthcoming ANSI/HFES 200 standard for improving the accessibility and usability of software user interfaces.

Due to regulatory constraints, AT&T does not develop or manufacture Customer Premise Equipment (CPE), although it does resell products from vendors. However, AT&T takes responsibility for the services it offers and is committed to offering a range of CPE devices for use on its network that are accessible to people with and without disabilities. AT&T Labs has, in the past, reviewed telephones with talking Caller ID, as well as volume control and large buttons. AT&T’s new Unified Messaging service has a text-to-speech capability that allows e-mail to be read to a subscriber over the telephone.

Wireline Customer Service

In most of the states AT&T serves, the company operates call centers specially designated for our wireline customers with disabilities. To ensure that our customers with disabilities have access to the assistive equipment they need, AT&T partners with HITEC Group International, Inc., a manufacturer and distributor of equipment, including amplified telephones, accessories and personal listening systems, for seniors and people with disabilities. HITEC operates as AT&T’s equipment “Special Needs Center” in all five AT&T regions, provides educational assistance to AT&T customers in many of our

states, and manages the TTY distribution program for AT&T in Wisconsin, Michigan, and Ohio.

Our call center in the West region, which is open from 8 a.m. to 6 p.m. Monday through Friday, has been serving the disabled community for over 25 years and offers California and Nevada customers help in both English and Spanish. Initial training for the forty representatives who handle calls to this center is eight weeks and additional training is completed quarterly.

A customer seeking assistance can either dial a special toll-free number or call the normal business office. If the customer prefers to be assisted by this center, a notation can be put on the account so that the call is automatically transferred to the center. The account notation identifies the specific disability of the customer, so service representatives can provide assistance that is tailored to that customer. Representatives are available to answer questions about AT&T products as well as to assist with providing Braille and large print bills, free speed dialing and 3-way calling, and local Directory Assistance exemptions.

As a result of the recent mergers, AT&T is revising the Methods and Procedures (M&Ps) used by all service representatives, incorporating the best practices from each company. This material will aid the representatives as they serve customers with disabilities by providing them clear and accurate information so that they can better explain services that are available, such as assistive CPE, discounted toll, DA exemptions, lifeline, bill format, etc. In addition, a new training module which will discuss the various types of disabilities, how the disabilities might impact a customer's use of telecommunications products and services, and how to provide appropriate support

to the customer is being created to supplement the M&Ps. Training on both the M&Ps and Awareness Module will begin in 2008.

Wireless Products and Services

As telecommunications evolved to include the new wireless technology, AT&T continued its commitment to develop new and innovative devices that could assist its customers with disabilities. AT&T's wireless division, AT&T Mobility, working closely with deaf and disability organizations and manufacturers of TTYs and hearing aids, was a leader in the development of technical standards for TTY and hearing aid compatibility so that AT&T Mobility could better meet the needs of its wireless customers with disabilities. AT&T Mobility carefully analyzes each device that will be used on its network, and welcomes and encourages specialized capabilities, such as audible prompts, to assist people with low vision. For example, AT&T Mobility was the first major wireless carrier to offer screen reading software ("TALKS") which made handsets accessible to people who are blind. This software reads aloud basic handset functions such as battery life and network strength, as well as Caller ID, the calendar, text messages and email. AT&T Mobility also offers handsets with voice input and voice output for many of the handset functions such as key echo or dialing from a contact list. AT&T Mobility is working with Code Factory to offer Mobile Speak and Mobile Magnifier, two software products that will help people with disabilities get the most out of their mobile phones. Some handsets with screen readers, like Mobile Speak, can even enable customers with qualifying disabilities to read books in a specialized format designed for people who are blind or have print disabilities. AT&T encourages its suppliers to submit

a Voluntary Product Accessibility Template (VPAT), which is a checklist designed to gauge how easy it will be for seniors and people with disabilities to use the product.

AT&T Mobility's User Experience Design Team (uXd) emphasizes the importance of universal access during each phase of product design and development. Consider screen icons, for example. To guarantee maximum accessibility, uXd advises suppliers to include additional descriptions for icons so that assistive technologies can read them. It also cautions suppliers not to rely too heavily on visual representations for the main functionalities of a device, since that approach is a significant barrier for visually-impaired people. The uXd recommends icons that are non-verbal so that people unable to read can understand them, and reminds suppliers to consider customers who are color blind.

TALKS is just one of the many ways that AT&T Mobility is making mobile phone use possible for people with disabilities. Other examples include:

- VoiceDial, a service which provides dialing assistance to customers with significant vision, cognitive and physical disabilities. With this service, customers can state a name or telephone number and the device will automatically dial it.
- Text Accessibility Plan, a service plan for people with hearing or speech difficulties. This plan includes free 911, up to 5,000 text messages and unlimited Internet access on a range of devices.
- Handsets that can enlarge the font size on primary device functions.
- Handsets that speak aloud each number that the user dials.

- Voice command software that allows customers to use verbal commands to dial a number or retrieve information such as the date and time.

It is often the case that features and services that are developed to help customers with disabilities end up being useful to all customers. A vibrating phone helps people with a hearing loss, but it also allows a user who can hear to avoid embarrassing interruptions during a business meeting. The talking Caller ID device is essential if you are visually impaired, but it also comes in handy for a person with perfect eyesight who doesn't want to leave the dinner table to check who is calling.

Wireless Customer Service

In AT&T Mobility stores across the United States, Hearing Aid Compatibility (HAC) training ensures sales personnel are well versed in HAC programs and protocols. Bi-monthly audits of our retail stores are conducted to ensure compliance with the Americans with Disabilities Act, and area managers inspect each store every 60 days for HAC compliance. The results of these inspections are recorded and monitored by compliance managers and upper management.

Information about wireless products is available at the AT&T Mobility website where a section on disability resources, including information on TALKS, HAC devices, VoiceDial, 711 TRS Access, TTY compatible telephones and TTY compatible devices, and the Text Accessibility Plan (TAP) is featured.

The National Center for Customers with Disabilities handles inquiries and requests relating to AT&T Mobility's products and services. The center uses specialized wireless assistance (through direct voice, TTY, and e-mail) to help customers with disabilities who have accessibility and usability questions. Representatives are given

special training on hearing aids, TALKS phone, voice dialing, and TTY. In addition, a list of customers using specialized programs such as Voice Dial, TAP Rate Plans and buyers of TALKS software that have applied for a rebate is maintained, and representatives can arrange for Braille or large print billing, as well materials in alternate format when requested by the customer.

Keeping Our Customers Informed

AT&T is committed to publicizing its services and products for people with disabilities. In selected regions, AT&T includes an insert in customers' phone bills that detail available options. Other customers are reached via a direct mail campaign, requesting that they contact company representatives at a toll-free number if they or someone they know has a disability. A recent issue of StarLines®, a state-specific bill insert which is sent to nearly 11.4 million residential customers in our nine southeastern states (including a Spanish version in Florida), was dedicated to our customers with disabilities and their families. The insert included information on AT&T's products and services for customers with special needs.¹

AT&T has participated in a number of disability-related expos and conferences, including TDI, National Council on Independent Living, Ever Widening Circle - World Institute on Disability Annual Gala including performances by disabled artists, Deaf/Nation Expo and the San Antonio Abilities Expo. In 2006, AT&T Mobility representatives hosted the Get-to-Know-You Dinner and offered handset audio testing to conference participants at the Hearing Loss Association of America Conference. In 2007, AT&T had a presence at the American Council of the Blind National Convention and the IDEAS conference.

¹ See Attachment 1.

AT&T has developed two web sites, www.att.com/access and www.wireless.att.com/disabilityresources, designed to guide customers with disabilities to the right products and services.

The company has also worked to make its advertising accessible to people with disabilities. Since June 2007, nearly all of its television commercials have been close-captioned. As AT&T has done with other diverse market segments such as the Hispanic/Latino and African American communities, AT&T has run ads in appropriate publications tailored to people with disabilities. For example, an article in the November/December 2007 issue of “Diversity Careers in Engineering and Information Technology” featured an interview with a member of the AT&T Labs Human Factors team.² Additionally, aging and disability- focused ads ran in the November/December 2007 edition of AARP magazine in California and Florida.

Our Commitment to Our Employees

AT&T is dedicated to finding ways to improve the working environment for its employees with disabilities, often through its Integrated Disability Service Center. The Center helps employees maintain their work commitments when they are faced with medical conditions that affect their ability to perform essential job functions. The Job Accommodation process allows employees to request temporary or permanent work restrictions, obtain appropriate accommodations to assist them in performing their job responsibilities, or be considered for temporary work assignments as appropriate.

Since 1993, Individuals with Disabilities Enabling Advocacy Link (IDEAL), one of AT&T’s ten company-recognized employee advocacy groups, has served as a resource for AT&T. Members of IDEAL make presentations regarding disability etiquette and

² See Attachment 2.

other aspects of the employment experience during National Disability Employment Awareness month. IDEAL also provides employees with disabilities the opportunity for networking and leadership development while supporting AT&T's overall diversity and inclusion objectives.

Cingular Wireless (now AT&T Mobility) received the U.S. Department of Labor's New Freedom Initiative (NFI) Award from Labor Secretary Elaine Chao for its innovative employment practices relating to people with disabilities, and was invited to become part of the prestigious "Circle of Champions," the select group of companies and individuals who are past NFI Award winners. In 2006, Cingular Wireless ranked #2 in DiversityInc's Top Ten Companies for People with Disabilities and in 2007, AT&T ranked #3 in DiversityInc's Top 50 Companies for Diversity.

Our Commitment to the Community

AT&T and the AT&T Foundation have contributed significantly to disability-related causes in the communities the company serves. The company helped develop the Leadership Institute for Managers with Disabilities at the UCLA Anderson School of Management, the first institute that relies on the experiences of executives and managers with disabilities to examine these critical issues, and became one of the Founding Organizations. In 2006 and 2007, AT&T sponsored the World Institute on Disability's Projecto Vision, a bridge to increase employment of Latinos with disabilities. AT&T has participated in career fairs hosted by *Careers and the DisABLED* magazine, and is a sponsor of the 2008 U.S. Paralympic team.

Employees and retirees also serve on various boards and in advisory capacities for a range of disability organizations including the Alliance for Technology Access, the World Institute on Disability, the American Foundation for the Blind and the National Spinal Cord Injury Association.

In the past 10 years, the AT&T Foundation has contributed more than \$10.3 million in grants to disability-related organizations. These contributions include:

- A \$1 million grant to Community Technology Center's Network (CTCNet), with the goal of providing new technology resources for people with disabilities. In collaboration with the Alliance for Technology Access, CTCNet upgraded services and equipment at community technology centers nationwide (2006).
- A \$100,000 grant to the Center for Accessible Technology to develop a "human factors" usability lab and related research (2006).
- A \$50,000 grant to the San Antonio Lighthouse for the Blind to provide educational programs, community support services, career development and training classes for people with impaired vision (2007).
- A \$50,000 contribution to the National Disability Institute for its 2008 Real Economic Impact Tour, which provides tax consultation services to people with disabilities (2007).
- A \$25,000 contribution to the American Foundation for the Blind in Dallas for a study of inexpensive speech and screen enlargement products that might help adults with impaired vision to access the Internet (2007).
- A \$200,000 grant to Ford's Theater in Washington, DC, to help the historic venue improve the accessibility of its lobby (2007).

- A \$62,500 grant to Goodwill Industries of Dallas to support the development of a Cyber Cafe for people with disabilities and others without home Internet access.

The Future

AT&T remains committed to the accessibility of our products and services and plans to incorporate the synergies and best practices from each company. The new U-verse and Homezone products provide closed-captioning and SAP audio description. A Global Network Address Book project is currently under way which will be beneficial to individuals with cognitive disabilities and will enable other services, such as Voice Dial, to benefit people with other disabilities. Also being researched is a TV remote control activated by voice.

Alexander Graham Bell's interest in making life easier for deaf people led directly to his invention of the telephone. For more than a century, the company that Bell founded has reflected his ideals. AT&T's vision is to connect people with their world, everywhere they live and work, and to do it better than anyone else. Ensuring that customers with disabilities have the right products and services to connect to their world is a fundamental component of fulfilling that vision.