



reiterating the request for rulemaking to make CTS a mandatory service.<sup>3</sup> AT&T submits these comments in support of a rulemaking to consider making CTS a mandatory form of TRS.

Captioned telephone service is a form of TRS that permits persons with a hearing disability to simultaneously listen to what the other party is saying and read captions of what the other party is saying on the same device.<sup>4</sup> Although the Commission has previously recognized CTS as a form of TRS eligible for compensation from the Interstate TRS Fund, it has not made CTS a mandatory service<sup>5</sup> that must be offered by common carriers<sup>6</sup> and state TRS programs certified under Commission rules.<sup>7</sup>

AT&T agrees with the consumer groups that the time is right to review whether to approve CTS as a mandatory form of TRS. For many disabled and hard of hearing individuals, CTS may offer the best opportunity to communicate in a manner that is most functionally equivalent to standard telephone service. The ability of a CTS user to simultaneously read and possibly hear what the other party to the conversation is saying offers these individuals a form of near real-time communication unlike other forms of TRS. Further, the ability of a user to discern the substance of a conversation provides that user with an independence that is reinforced by the ability to place the call directly without direct interaction with a communications assistant and the delays that sometimes accompany other forms of TRS.

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<sup>3</sup> See *Telecommunications Relay Service and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities*, CG Docket 03-123, Supplement to Petition to Mandate Captioned Telephone Relay Service (filed June 10, 2009) (the “Supplement”).

<sup>4</sup> See *Telecommunications Relay Service and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities*, CC Docket No. 98-67, Declaratory Ruling, 18 FCC Rcd 16121 (Aug. 1, 2003).

<sup>5</sup> *Id.*, ¶¶ 17, 19

<sup>6</sup> 47 U.S.C. § 225; 47 C.F.R. § 64.603.

<sup>7</sup> 47 C.F.R. § 64.606.

While CTS is currently a valuable form of TRS, it will likely become more valuable in the future, as the demographics of the United States continue to shift to a population with a greater percentage of senior citizens. Over the next decade, as persons who comprise the Baby Boomer generation enter their senior years, the link between aging and hearing loss suggests that the number of deaf and hard of hearing individuals will increase. In that instance, persons who are accustomed to being independent and engaging in real-time communications with family and friends may be forced to rely on forms of TRS, that while beneficial, may not provide the type of sort of real-time communication to which they are accustomed. CTS may very well be the solution to fill that gap.

Yet, as long as CTS is an optional form of TRS, it is subject to varying restrictions and standards throughout the country and to the shifting budget constraints of the states. Making CTS a mandatory form of TRS would provide deaf and hard of hearing persons throughout the United States with a standardized reliable form of near real-time communications that is not subject to state budget constraints or burdensome restrictions. AT&T encourages the Commission to issue a rulemaking to consider this important issue.

For the foregoing reasons, AT&T urges the Commission to consider this submission.

Respectfully submitted,



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