

July 5, 2011

Via Electronic Filing

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

Re: *Ex Parte* Presentation, CG Docket Nos. 10-145, 10-213, WT Docket No. 96-198

Dear Ms. Dortch:

On June 30, 2011, Christopher Guttman-McCabe, Vice President, Regulatory Affairs, CTIA – The Wireless Association® (“CTIA”), Scott Bergmann, Assistant Vice President, Regulatory Affairs, CTIA, Matthew Gerst, Counsel, External & State Affairs, CTIA and Tara Corvo, Member, Mintz, Levin, Cohn, Ferris, Glovsky and Popeo, P.C. hosted a meeting with Karen Strauss (CGB), Rosaline Crawford (CGB), Eliot Greenwald (CGB), Richard Hindman (EB), Janet Sievert (EB), Jeffery Tignor (WTB), Jane Jackson (WTB), Elizabeth Lyle (WTB), Brian Regan (WTB), Vijay Pattisapu (WTB), Doug Brake (WTB) and via telephone David Hu (WTB) and Genevieve Ross (WTB).

CTIA believes that the Federal Communications Commission (“FCC” or “Commission”) should implement the Twenty-First Century Communications and Video Accessibility Act (“CVAA”) by providing clarity in the rules, certainty in their application, and the flexibility that will ensure the U.S. wireless industry continues to offer the most innovative products and services in the world to all consumers, including persons with disabilities.

Consistent with its comments and reply comments in the above-captioned proceedings,¹ CTIA addressed concerns with the Commission’s proposed implementation of the CVAA. CTIA also provided a summary of our industry leading efforts to educate consumers with disabilities about accessible wireless equipment and services through www.AccessWireless.Org. To help guide the meeting, CTIA provided attendees with the attached Power Point slides, which summarize the items discussed.

¹ See Comments of CTIA-The Wireless Association®, CG Docket Nos. 10-213 & 10-145, WT Docket No. 96-168 (filed Apr. 25, 2011); Reply Comments of CTIA-The Wireless Association®, CG Docket Nos. 10-213 & 10-145, WT Docket No. 96-168 (filed May 23, 2011).

In addition, the following items were discussed during the meeting:

- **“Primary Purpose” Analysis:** CTIA stated that allowing service providers and manufacturers to determine whether the “primary purpose” of equipment are designed for or services are offered as “Advanced Communications Services” will provide industry with the needed clarity of the rules and certainty to continue offering innovative products and services.
- **Informal Complaint Process:** CTIA stated that the Commission’s proposed informal complaint process must be designed to provide an easy means for consumers to resolve their concerns, rather than creating a litigious process by imposing the burdens of the formal complaint process on the responding entity.
- **Application of Section 255 to Multi-Purpose Equipment and Services:** CTIA stated that Section 716(f) of the CVAA is meant to apply to multi-purpose devices or services with interconnected Voice over Internet Protocol (“VoIP”) service, and provides the clear answer that Section 255 of the Communications Act of 1934, as Enacted by the Telecommunications Act of 1996, must apply in such situations.

Pursuant to Section 1.1206 of the Commission’s rules,² this letter and the presentation used during the meeting are being electronically filed via ECFS with your office and a copy of this submission is being provided to the meeting attendees. Please let the undersigned know if you have any questions regarding this filing.

Sincerely,

/s/ Matthew Gerst

Matthew Gerst
Counsel, External & State Affairs
CTIA-The Wireless Association®

Attachment

cc: Karen Strauss
Rosaline Crawford
Eliot Greenwald
Richard Hindman
David Hu
Jane Jackson
Elizabeth Lyle
Brian Regan
Genevieve Ross

² 47 C.F.R. § 1.1206.

Janet Sievert
Jeffrey Tignor
Doug Brake
Vijay Pattisapu