

FCC COMMENTS

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Re:

**Facilitating the Deployment of Text-to-911 and Other Next Generation 911 Applications
PS Docket No. 11-153
Framework for Next Generation 911 Deployment - PS Docket No. 10-255**

I am Donna Platt. I am Emergency Education Program manager with a non-profit agency, Hearing, Speech & Deafness Center in Seattle, Washington. I coordinate and conduct training to 9-1-1 telecommunicators on effective communication access to callers who are deaf, deaf-blind, late deafened, hard of hearing, and have speech disabilities in Washington State for 12 years. I also participate in several national committees on reviewing and providing input & solutions regarding direct 9-1-1 access for people with disabilities. I am vice chair with National Emergency Number Association (NENA)'s Accessibility Committee. I serve on advisory committees with FCC's Emergency Access Advisory Committee and University of California – Berkeley's National Advisory Board of Preparedness & Emergency Response Research Center (PERRC).

Calling 9-1-1 directly is critical for everyone who is experiencing a life and death emergency. . Communication technology is growing and changing rapidly. Unfortunately those technologies are NOT compatible with today's 9-1-1 system.

Those technologies give people who deaf, deaf-blind, late deafened, hard of hearing and have speech disabilities greater options to communicate especially via text (SMS, email, instant messaging) and video, however they would have to use 3rd party (internet based relay services) to reach 9-1-1 using text or video.

Calling 9-1-1 via relay services is NOT considered as DIRECT access. Using a 3rd party for communication could lead to time delay (FCC ruling states that the video relay service average speed answer [ASA] is 120 seconds and internet protocol relay service's ASA is 10 seconds. The NENA standard recommended ASA is 10 seconds.). There is no FCC ruling on ASA for relay service providers to connect those relayed calls to 9-1-1 agencies.

I have conducted a number of 9-1-1 test calls using Internet Protocol (IP) relay services during trainings to 9-1-1 telecommunicators for several years. Often it would take average 4 or 5 minutes to connect to 9-1-1 agencies. Those relayed calls would go through two channels (relay service and routing service) to reach 9-1-1. The FCC ruling states that the 9-1-1 call should be top priority for relay service providers to respond however the relay agents would connect to live person to provide routing services to appropriate Public Safety Answering Points (PSAPs – another word for 9-1-1 agencies). Some relay service providers have contracts with vendors that provide routing services.

Also those relayed calls would go through one of three trunks; 9-1-1, non-emergency and administration on the 9-1-1 screen. Telecommunicators would prioritize by answering 9-1-1 calls first prior to calls via non-emergency or administration lines. Sometimes non-emergency or administration calls will go to different offices other than 9-1-1 agencies. Often many times those relayed calls would go through the non-emergency and administration lines which don't show the callers' locations on the 9-1-1 screen. Also some calls from non-emergency or administration line cannot be transferred to other PSAPs.

Like everyone, it would be easier and preferable to call 9-1-1 directly via text or video while on mobile (smart phone or computer) or non-mobile device. EVERY SECOND COUNTS!

Real time text would be my first preference so that the telecommunicator can read while I type. S/he will have information in case circumstance prevents me from continuing to type. I also would prefer to utilize SMS if needed. A delivery confirmation or receipt is necessary as soon as the text message is read by other party.

Also it is strongly recommended the call is to include GPS to determine where I am located.

Many people terminated landline services. Some areas in the U.S. do not have soft dial tones or warm lines to allow people to call 9-1-1. All places that have phone jacks should include these features, which is critical for TTY users. TTY can be utilized with backup batteries during power outage.

Education to community members who are deaf, deaf-blind, and hard of hearing is exceptionally important. Live presentation is strongly recommended. Interaction with members is more effective because members have the option to ask questions. A team of presenters should be combined of a representative from local PSAP and Deaf (or Deaf-Blind or hard of hearing) advocate. Members will be able to learn what communication options are available in their areas. Types of communication access vary from location to location.

Educational video clips may be a great resource. One specific topic per clip to be produced up to approximately 3 minutes is best. It is more effective to demonstrate visual information such as smart phone, text, and video. It is appropriate and highly recommended to utilize Deaf

people with ASL skills to sign the information. The video clips should represent information in neutral way and layman language which is easily understood by viewers.

Captions should be included in all ASL and spoken language educational video clips to provide access to viewers. All caption video clips should be given option to be turned on and off.

Voice and audio are not an option or beneficial to me due to my deafness. My communication preferences vary depending on where I am and the circumstance I would be in. It is imperative to have the option to switch between text and video without limiting to one mode of communication. Access that millions of Americans with disabilities are already paying for through 9-1-1 telephone surcharges, I strongly urge the Commission to take the appropriate action to establish aggressive timelines that will bring this life savings technology to the 40 million individuals who are deaf, deaf-blind, late deafened, hard of hearing, and have speech disabilities.

Thank you for consideration in this aforementioned matter.
Donna Platt