PS Docket No. 11-153, In the Matter of Facilitating the Deployment of Text-to-911 and Other Next Generation 911 Applications

PS Docket No. 10-255, In the Matter of Framework for Next Generation 911 Deployment

Comments filed by

The Students in
COM 390 – Accessible Communication Technologies,
taught by Christian Vogler in the Spring of 2013 at Gallaudet University

and

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Who we are

COM 390 is a class that is taught annually at the Department of Communication Studies at Gallaudet University in the spring semester, with a strong emphasis on accessible communication technologies for the deaf and hard of hearing. Covered topics include access to 9-1-1, relay services, accessible telecommunications, and captioning. This class is currently taught by Christian Vogler, who is the director of the Technology Access Program, a co-principal investigator of the Rehabilitation Engineering Research Center on Telecommunications Access (RERC-TA), and a subcommittee leader in the Emergency Access Advisory Committee.

Introduction

The class would like to respectfully offer their thoughts on bounceback message proposals that were highlighted in other comments as part of the text-to-9-1-1 FNPRM[1], as well as their thoughts on priorities in consumer education and outreach. These comments are the outcome of multiple homework assignments on analyzing the bounceback messages and consumer education requirements, followed by spirited discussion in class, which exposed a diverse range of viewpoints.

Bounceback messages

The class discussed the bounceback messages based on two underlying assumptions:

1. In an emergency, keeping information simple and to the point is vital, so as not to waste time or mental effort.
2. In an emergency people are stressed, and their cognitive functions could be impaired due to the stress.

In the initial round of discussion, the class's favorite bounceback messages crystallized around variations of these two patterns:

1. Call 9-1-1 for emergency. Text to 9-1-1 not available in this area.

2.
   (a) Text-to-9-1-1 service not available. Call 9-1-1 for emergency.
   (b) Text-to-9-1-1 service not available. Call 9-1-1 by voice, TTY or relay.

In the follow-up discussion after allowing time for reflection, the unanimous class consensus was that a variation of pattern 2 would work best, *with most participants supporting 2(a):* ***Text-to-9-1-1 service not available. Call 9-1-1 for emergency.***

The arguments in favor and against each of these patterns emerged as follows:

1. The message is short and simple and does not place a large cognitive burden on the person. It also tells the person up front in the first sentence

[1] See, e.g., the comments by Teleocmmunications for the Deaf and Hard of Hearing et al., PS Dockets 11-153 and 10-255, pp. 4-5 and 8-9, 1/30/2013.

what to do (call 9-1-1), with no risk of missing the "next step." However, the class was concerned that the first sentence to call 9-1-1 does not fit with the person's train of thought and could lead to the person reacting in surprise: "What? I just did call 9-1-1 via texting – why do I have to call again?"

2. Common to both (a) and (b): This bounceback message follows the person's train of thought. He or she just attempted to contact 9-1-1, and is expecting something to happen in response. Seeing up-front that the text to 9-1-1 failed is a valid and logical response to this attempt.
   (a) Option 2 (a) is short and concise, and does not require people to spend any more time reading than necessary. However, there is concern that some people my not know what their other options are for contacting 9-1-1.

   (b) Option 2 (b) reaches deaf and hard of hearing people who are used to making TTY or relay calls. For a hearing person, it could increase awareness of relay services and telecommunications access for the deaf and hard of hearing. It also lists all the options for calling 9-1-1. However, there is concern that people who do not know about relay services may get confused by this message. The class offers as a counterpoint that text-to-9-1-1 is especially important to deaf and hard of hearing people, who would not get confused by the mention of "relay."

Education and outreach

Because of the unique nature of text-to-9-1-1, a massive education and outreach effort is necessary, and the information should be presented through a variety of different channels:

- Internet (email and WWW)
- Social Media
- TVs, Radio, and other media
- Ad campaigns
- Billboards
- Payphone screens
- Carrier-induced notifications (including update notifications)

- Mailings
- In-store when you buy a phone

In general, education and outreach information must be accessible to people with disabilities, including people who are deaf, hard of hearing, deaf-blind, visually impaired, blind, have a speech disability, and others. The same information also should be available in multiple languages, including ASL and Spanish.

From the class's perspective, these topics are the most critical to learn about as a deaf or hard of hearing consumer:

1. How do you know if text-to-9-1-1 is available?

We would like to know from the phone carriers through a notification, similar to an OS update notification, and also through mailings from the carriers. Information should be included in brochures when you buy a new phone, and also be provided by a sales rep. There should also be emails with links that lead to more information. The information also should be available in a publicly searchable database on the web, and be made available in stores.

2. What can go wrong during text-to-9-1-1, and what should you do then?

Education should focus on what other options are available to contact 9-1-1 (e.g. voice call, TTY, or relay). It is also important to tell people how long they should wait for a response from 9-1-1 before giving up and looking for other ways to contact the service.

3. When can you use text-to-9-1-1, and when should you?

It should be made clear that text-to-9-1-1 is only for real emergencies, not for prank calls and sending information about non-emergencies. One large part of education efforts also needs to tell consumers, who are unable to make voice calls, when it is better to text-to-9-1-1 and when it is better to use a TTY or relay service. These efforts also need to distinguish between situations where an emergency call happens from home at an address registered with a relay service and where an emergency happens on the road.
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The class also wishes to note that it is important to educate people about how text-to-9-1-1 differs from the currently available options to contact 9-1-1, and what its strengths and limitations are.

Conclusion

Lives are at stake for deaf and hard of hearing people who are unable to make voice calls to 9-1-1. The ability to text 9-1-1 means a huge step forward in making 9-1-1 more accessible to people with disabilities. Because emergencies are so stressful, and the cognitive functions of people may be impaired when the experience such stress, it is especially important that the bounceback message is short and to the point, and offers concrete information about what to do. At the same time, because text-to-9-1-1 will not behave like a voice call to 9-1-1, it is important that consumers are informed about what text-to-9-1-1 means to them, and that it happens through channels that will reach those who need text-to-9-1-1 the most. Thank you for your consideration.

Respectfully submitted

/s/ The students of the COM 390 class

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