

December 11, 2013

VIA ELECTRONIC FILING

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

Re: Ex Parte communication to the Technology Transitions Policy Task Force on the needs of people who are deaf and hard of hearing during the TDM to IP transition

GN Docket No. 13-5 and WC Docket 12-353

Dear Ms. Dortch:

Telecommunications for the Deaf and Hard of Hearing, Inc. (TDI), the National Association of the Deaf (NAD), the Deaf and Hard of Hearing Consumer Advocacy Network (DHHCAN), the Hearing Loss Association of America (HLAA), the Association of Late-Deafened Adults (ALDA), the Cerebral Palsy and Deaf Organization (CPADO), the American Association of the Deaf-Blind (AADB), and the Technology Access Program at Gallaudet University (collectively, the “Consumer Groups”) are writing to express their support for a Common Real-time text Interconnection Standard proposed by the Rehabilitation Engineering Research Center on Telecommunications Access (RERC-TA)¹. The Consumer Groups also would like to strongly reiterate that the needs of people who are deaf, hard of hearing, or deaf-blind must be fully met in the TDM to IP transition, and that the interests of these stakeholders must be represented during planning and rollout of the IP transition.

The Consumer Groups stated in a filing responding to the Public Note regarding AT&T’s and NCTA’s petitions to launch a proceeding on the TDM to IP transition² that “*the Commission must take care to ensure that migration to IP-based networks occurs in a manner that preserves and fosters accessibility for deaf and hard of hearing consumers*”³ and that “[*the Commission*] must ensure that all stakeholders are adequately represented in both the process of regulatory change and the actual regulations that may ensue.”⁴

There are two fundamental concerns in the TDM to IP transition planning that must be addressed now, in order to ensure that people who are deaf, hard of hearing, or deaf-blind, are not left behind in the accelerating technological advances in telecommunications:

1. People who currently depend completely or partially on real-time text-based communications, intermixed with and without voice as part of the same call (e.g.,

¹ “Proposal R1 – Revised.” Ex Parte Filing by the RERC-TA. GN Docket 13-5, December 6, 2013.

² Public Notice, Pleading Cycle Established on AT&T And NTCA Petitions, DA 12-1999, WC Docket No. 12-353, released Dec. 14, 2012.

³ Comments filed by Telecommunications for the Deaf, Inc. et al., p. 2. WC Docket 12-353, January 28, 2013.

⁴ *Id.*, p. 9

TTYs, TTYs + VCO/HCO, captioned telephony), via PSTN must not be left without telecommunications access that is at least functionally equivalent to what they currently have. They also must be able to continue using real-time text intermixed with voice as part of the same call, irrespective of whether one or both parties are on PSTN or IP networks, and be able to connect via fully interoperable ten-digit number dialing.

2. The transition to IP networks presents a huge opportunity to improve access greatly over what is currently available with PSTN. To this end, planning for the IP transition must not merely aim to emulate or replicate PSTN functionality, but *actively strive to enhance it* by setting new interoperability standards for simultaneous real-time text and voice over IP, as well as video. In particular, unlike PSTN, IP-based telecommunications can support the following:
 - a. Typing and talking simultaneously, rather than taking turns
 - b. Adding video and other media to calls, including the combination of real-time text, audio, and video all simultaneously as part of the same call
 - c. Interoperability across all media with both mainstream telecommunications equipment & services, and relay services

The Consumer Groups are concerned that if no action is taken now to address these two points, a golden opportunity to raise the bar for everyone with greatly improved access will be lost, and people who are deaf, hard of hearing, or deaf-blind will be relegated to the sidelines forever. To prevent this from happening, there must be a set of interoperability standards for IP-based real-time text + voice communications, as well as interoperability with video. To this end, the Consumer Groups fully support the RERC-TA R1 proposal on a Common Real-time text Interconnection Standard. The Consumer Groups also propose that ACS equipment and services must comply with these interoperability standards in order to meet the accessibility requirements.

The Consumer Groups stand ready to work with the Technology Transitions Policy Task Force and with industry to address the above-mentioned issues, and to ensure that no one will be left behind.

Respectfully submitted,

/s/ Christian Vogler, Ph.D.

Director, Technology Access Program, Gallaudet University

cc:

The Technology Transitions Policy Task Force
Ruth Milkman, Chief of Staff to Chairman Wheeler
Philip Verveer, Senior Counselor
Gigi Sohn, Special Counsel for External Affairs
Diane Cornell, Special Counsel
Renee Gregory, Legal Advisor on Engineering and Technology, Wireless, and Incentive Auctions
Maria Kirby, Legal Advisor on Media, Consumer and Governmental Affairs, and Enforcement
Karen Peltz Strauss, Consumer and Governmental Affairs
Gregory Hlibok, Disability Rights Office

Telecommunications for the Deaf and Hard of Hearing, Inc. (TDI)

Claude Stout, Executive Director • cstout@TDIforAccess.org
8630 Fenton Street, Suite 121, Silver Spring, MD 20910
www.TDIforAccess.org

National Association of the Deaf (NAD)

Howard Rosenblum, Chief Executive Officer • howard.rosenblum@nad.org
Contact: Andrew Phillips, Policy Counsel • andrew.phillips@nad.org
8630 Fenton Street, Suite 820, Silver Spring, MD 20910
301.587.1788
www.nad.org

Deaf and Hard of Hearing Consumer Advocacy Network (DHHCAN)

Contact: Cheryl Heppner, Vice Chair • CHEppner@nvrc.org
3951 Pender Drive, Suite 130, Fairfax, VA 22030

Hearing Loss Association of America (HLAA)

Anna Gilmore Hall, Executive Director • agilmorehall@Hearingloss.org
Contact: Lise Hamlin, Director of Public Policy • LHamlin@Hearingloss.org
7910 Woodmont Avenue, Suite 1200, Bethesda, MD 20814
301.657.2248
www.hearingloss.org

Association of Late-Deafened Adults (ALDA)

David Litman, President • president@alda.org
Contact: Brenda Estes • bestes@endependence.org
8038 Macintosh Lane, Suite 2, Rockford, IL 61107
www.alda.org

Cerebral Palsy and Deaf Organization (CPADO)

Contact: Mark Hill, President • president@cpado.org
1219 NE 6th Street #219, Gresham, OR 97030
503.468.1219

American Association of the Deaf-Blind (AADB)

Contact: Randall Pope, President • ranpope@comcast.net
PO Box 2831
Kensington, MD 20891
www.aadb.org

Technology Access Program at Gallaudet University

Contact: Christian Vogler, Director • christian.vogler@gallaudet.edu
800 Florida Ave NE, SLCC 1116, Washington DC 20002
202.250.2795
tap.gallaudet.edu