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February 11, 2014

via electronic filing

Marlene H. Dortch
Secretary, Office of the Secretary
Federal Communications Commission
445 12th Street, SW, Room TW-A325
Washington, DC 20554

Re: Notice of *Ex Parte* Presentation

Wireless E911 Location Accuracy Requirements – PS Docket No. 07-114

Structure and Practices of the Video Relay Service Program – CG Docket No. 10-51

Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities – CG Docket No. 03-123

Dear Ms. Dortch,

On February 6, 2014, Claude Stout of Telecommunications for the Deaf and Hard of Hearing, Inc. (TDI) and Andrew Phillips of the National Association of the Deaf (NAD), (collectively, “Consumer Groups”), and Blake Reid of the Samuelson-Glushko Technology Law & Policy Clinic at Colorado Law (TLPC) discussed pending Commission action in the above-referenced matters with Courtney Reinhard of Commissioner Michael O’Rielly’s office. On February 7, 2014, the Groups, joined by Cheryl Heppner of the Association of the Late-Deafened Adults (ALDA) and the Deaf and Hard of Hearing Consumer Advocacy Network (DHHCAN), and Lise Hamlin of Hearing Loss Association of America (HLAA) discussed the same topic with Maria Kirby of Chairman Wheeler’s office, Kris Monteith and Karen Peltz Strauss of the Consumer and Governmental Affairs Bureau, and Greg Hlibok and Suzy Rosen Singleton of the Disability Rights Office.

Consumer Groups understand that the FCC is considering Miracom's application to offer its InnoCaption mobile captioned telephone relay service (TRS). Consumer Groups believe it’s time for competition in mobile captioned telephone market, which at the moment has only one provider. Consumers and industry alike benefit from the kinds of innovation that occur when more than one provider is in the market. In this case, Miracom is offering a technology that is different from those of other vendors in the market and provide significantly improvements in the provision of captioned telephone services. We urged the Commission to carefully consider this application.

Consumer Groups are aware that the Commission has an item in circulation pertaining to indoor location accuracy technologies. We strongly recommend that the Commission takes action affirmatively on this item. It will be a tremendous boost for us as it will more effectively address our life, health, and security needs. First responders will be in a better position to come to our rescue when we call and ask for help. They will have the capacity to locate our whereabouts down to the floor and room/suite where we are in.

Consumer Groups have been concerned that some offices within the Commission were not coordinating their efforts closely with each other on TRS issues. We have asked for a meeting which will take place on March 4

Shaping An Accessible World



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with CGB and Office of Managing Director, FCC. We hope this will be the first of many meetings we have with them on TRS issues, and among the first items we plan to review with them are the definition, principles, and applications of functional equivalency for TRS.

Please don't hesitate to contact me if you have any questions regarding this filing.

Respectfully submitted,

A handwritten signature in black ink that reads "Claude L. Stout". The signature is written in a cursive, flowing style.

Claude L. Stout

Executive Director

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

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

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cc: FCC Chairman Tom Wheeler
Commissioner Michael O’Rielly, FCC
Maria Kirby, Office of FCC Chairman Tom Wheeler
Courtney Reinhard, Office of Commissioner Michael O’Rielly, FCC
Kris Monteith, Acting Chief, Consumer & Governmental Affairs Bureau, FCC
Karen Peltz-Strauss, Deputy Bureau Chief, Policy, Consumer & Governmental Affairs Bureau, FCC
Greg Hlibok, Chief, Disability Rights Office, CGB, FCC
Suzy Rosen Singleton, Attorney Advisor, Disability Rights Office, CGB, FCC