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May 21, 2014

Via Electronic Filing

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th St., SW
Washington, DC 20554

Notice of Ex Parte

Re: *Speech-to-Speech and Internet Protocol Speech-to-Speech Telecommunications Relay Services; Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities, CG Dockets Nos. 08-15 and 03-123*

AT&T Request for Clarification, or, in the Alternative, Petition for Expedited Waiver

Dear Ms. Dortch:

On July 19, 2013, the Federal Communications Commission ("Commission") amended its rules to require that speech-to-speech ("STS") providers offer STS users the option to have their voice muted so that the voice party to the call would not hear the STS user. *See* 47 C.F.R. §64.604(a)(1)(viii). Prior to the October 15, 2013, effective date of the rule change, AT&T Services, Inc. ("AT&T") filed with the Commission a request seeking clarification that on an incoming call to an STS user who elects to be muted, the communications assistant ("CA") could drop the STS user from the call and add the STS user back to the call with muting activated. If the Commission did not provide that clarification, AT&T requested a twelve (12) month waiver of the muting requirement retroactive to its October 15, 2013 effective date to allow AT&T to develop an alternative muting solution. In this letter, AT&T supplements the record with additional information as to the manner in which the new muting solution will work and AT&T's progress at deploying the solution.

Since the date of its filing, AT&T has been designing and developing the new muting function. Core software changes to AT&T's relay platform were required when initial attempts to create an alternative muting feature in the PBX/switch proved unsuccessful. However, designing and developing these core software changes was complicated by the fact that activating STS muting after call set-up deviated from the basic assumptions built into AT&T's relay platform. The overall time involved in the deployment of this STS Muting feature was further impacted by other planned

software releases. In designing, developing, testing, and implementing the new STS muting feature, AT&T followed these steps and approximate timelines, some of which overlapped:

- Attempted PBX solution/Architecture of software solution 6 wks
- Review & documentation of architecture, dependencies, and troubleshooting policies 4 wks
- Design & documentation of CA user interface implications 2 wks
- Accessibility review 2 wks
- Feature development, software modifications and change control 16 wks
- Unit & regression test cycles 3 wks
- Creation of CA training 2 wks
- CA training 2 wks
- Systematic deployment across two server farms 1 wk

AT&T has completed nearly all of these steps and expects to deploy this new muting solution by the end of May 2014. The end result of these efforts is a STS muting solution via the use of a privacy feature that allows a CA to place the voice caller on "hold," which effectively mutes the STS user's voice so that it is not heard by the voice party to the call. Upon implementation, the CA will be able to invoke this STS muting feature at any point in time during an incoming or an outgoing STS call and release the privacy feature when the STS user is not speaking to allow the CA to communicate with the voice party and the STS user to hear the voice party. In light of AT&T's planned deployment of this new muting feature, AT&T seeks only a waiver of the STS muting rule retroactive to the October 15, 2013 effective date to the end of May 2014.

AT&T anticipates a positive impact to STS users from deployment of the new muting feature. On a typical STS call, the CA assists the STS user in communicating during pauses in the STS user's speech to the extent requested by that STS user. Some STS users ask CAs to voice only those words or phrases that the voice caller is having difficulty understanding, while other STS users ask CAs to voice all speech, as would most STS users who wish to be muted. Some STS users want their speech voiced after finishing a sentence, while other STS users may want their speech voiced more frequently, after only a few words or phrases. These interactions will not change with AT&T's deployment of the new STS muting solution. The CA will continue to voice the STS user's speech to the degree and with the frequency sought by the STS user during pauses in the STS user's speech. The only change will be that a CA will be able to initiate muting at any time during the call at the request of the STS user without ending the existing call and reestablishing a new call.

Pursuant to Section 1.1206 of the Commission's rules, this letter is being filed electronically in the above-referenced docket.

Sincerely,


Vonda T. Long-Dillard

Marlene H. Dortch

May 21, 2014

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cc: Karen Peltz Strauss, Deputy Chief, Consumer and Governmental Affairs Bureau
Greg Hlibok, Chief, Disability Rights Office (DRO)
Eliot Greenwald, DRO