

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of)	
)	
Transition from TTY to Real-Time Text Technology)	CG Docket NO. 16-125
)	
Petition for Rulemaking to Update the Commission’s Rules for Access to Support the Transition from TTY to Real-Time Text Technology, and Petition for Waiver of Rules Requiring Support of TTY Technology)	GN Docket No. 15-178
)	

**REPLY COMMENTS OF
NTCA – THE RURAL BROADBAND ASSOCIATION**

I. INTRODUCTION

NTCA – The Rural Broadband Association (“NTCA”) herby submits these reply comments in support of comments submitted in response to the above referenced Notice of Proposed Rulemaking.¹ In its Proposed Rulemaking, the Federal Communications Commission (“Commission”) proposes to amend its rules to “facilitate a transition from outdated text telephone (TTY) technology to a reliable and interoperable means of providing real-time text (RTT) communication for people who are deaf, hard of hearing, speech disable and deaf-blind over Internet Protocol (IP) enabled networks . . .”²

NTCA represents nearly 900 rural rate-of return regulated telecommunications providers. All of NTCA members are full-service local exchange and broadband service providers and

¹ *Transition from TTY to Real-Time Text Technology CG Docket No. 16-145, Petition for Rulemaking to Update the Commission’s Rules for Access to Support the Transition from TTY to Real Time Text Technology, and Petition for Waiver of Rules Requiring Sup[port of TTY Technology, GN Docket No 15- 178, Notice of Proposed Rulemaking, FCC 16-53 (Rel.. April 29, 2016).*

² *Id.*, ¶ 1.

many members also provide fixed and/or mobile wireless service to their communities. As such, NTCA's interests in this proceeding are varied. All of NTCA's members are fully committed to ensuring accessibility. On the wireline side, NTCA's members are effectively supporting TTY services. NTCA's members who provide wireless service are working with the industry to develop and implement RTT or other accessible IP-based technologies.

II. THE COMMISSION SHOULD NOT REQUIRE WIRELINE PROVIDERS TO SUPPORT RTT TECHNOLOGY AT THIS TIME

Unlike some wireless networks, all wireline networks are technically capable of supporting traditional TTY services. All wireline providers, regardless of technology employed – including Voice over Internet Protocol (VoIP), are capable of and currently supporting TTY services. NTCA is unaware of and the Commission has cited no examples of TTY users being unable to complete TTY calls over wireline networks.

RTT is a wireless solution to a wireless technical problem. To date, all of the work being done on RTT is within the wireless industry and it is not yet complete. Wireline providers and vendors have remained outside of the effort and there has been no analysis of which NTCA is aware of the ability of wireline providers to transition to a RTT standard or what the associated costs might be. Verizon notes that wireline RTT poses different challenges than wireless and urges the Commission maintain its focus on the development of RTT for IP-based wireless services and devices.³ NTCA supports the request of the American Cable Association that the Commission defer consideration of whether wireline providers could support RTT technology.⁴

The wireless industry standards are still being developed and the industry is years away from small provider implementation. The Commission and the telecommunications industry is

³ Comments of Verizon, pp. 9-10.

⁴ Comments of the American Cable Association, p. 5.

correct to primarily focus its compliance efforts on the wireless industry. The Commission should similarly allow small providers with limited resources and fully functioning wireline TTY solutions to focus their efforts on deploying an effective solution for wireless IP-based networks.

III. THE COMMISSION SHOULD AFFORD TIER III WIRELESS PROVIDERS ADDITIONAL TIME TO COMPLY WITH RTT RULES

The nation's largest wireless providers continue to develop a RTT solution. The smallest wireless providers have no opportunity to influence the process or equipment designers and manufacturers. With caveats, ATT notes that the proposed end of year 2017 implementation timetable for may be achievable for Tier I providers,⁵ but no commenter suggests that Tier III providers can be in a position to comply within the same time frame.

Small providers are not involved in the process of developing standards or influencing manufacturers. It is not yet possible to know when compliant equipment will be widely available. Implementation challenges for the largest providers have yet to be identified, let alone addressed.

Assuming compliance is achievable for any carrier by the end of 2017, small providers will not have access to the equipment until long after that. The Competitive Carriers Association requests that its non-nationwide members who have deployed IP-based networks should have an additional eighteen months to deploy RTT, or another IP-based, accessible solution, over their IP-based networks, requiring deployment by June 30, 2019. It also requests that for those providers that have not deployed IP-based wireless networks, the compliance deadline be tied to deployment.⁶ NTCA supports this request to the extent it would apply to all Tier III wireless providers.⁷

⁵ Comments of AT&T, pp. 16-19.

⁶ Comments of the Competitive Carriers Association, p. 6.

⁷ A compliance deadline or broadly applied waiver should apply to a class of carriers, not limited to members of a particular association.

IV. CONCLUSION

For the above stated reasons, NTCA supports the comments who urge the Commission to focus its RTT compliance efforts on IP-based wireless networks and provide small wireless providers time beyond the proposed deadline for implementing RTT or other IP-based accessible solutions.

NTCA – The Rural Broadband Association

By: /s/ Jill Canfield
Jill Canfield
Vice President,
Legal and Industry &
Assistant General Counsel
4121 Wilson Boulevard
10th Floor
Arlington, VA 22203
(703) 351-2000