

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

In the Matter of )
)
Petition for Waiver of Rules Requiring Support of ) GN Docket No. 15-178
TTY Technology )
)
Cellular South )
)

ORDER

Adopted: December 18, 2015

Released: December 18, 2015

By the Chiefs, Consumer and Governmental Affairs Bureau, Public Safety and Homeland Security Bureau,
Wireless Telecommunications Bureau, and Wireline Competition Bureau:

I. SUMMARY

1. By this Order, the Consumer and Governmental Affairs Bureau, the Public Safety and
Homeland Security Bureau, the Wireless Telecommunications Bureau, and the Wireline Competition
Bureau (Bureaus) of the Federal Communications Commission (FCC or Commission) grant Cellular
South a temporary, limited waiver of the Commission’s requirements to support text telephony (TTY)
technology on wireless networks to the extent that they use Internet Protocol (IP) technologies. This
waiver expires December 31, 2017, or upon the effective date of Commission rules providing for
alternative IP-based wireless accessibility solutions, whichever is earlier.

II. BACKGROUND

2. On November 23, 2015, Cellular South filed a petition for waiver of the Commission’s
TTY-related requirements for its IP-enabled wireless services.1 Cellular South’s request followed the
release of orders by the Bureaus to grant similar waiver requests filed by AT&T and Verizon.2

A. TTY Requirements

3. A TTY is a “machine that employs graphic communication in the transmission of coded
signals through a wire or radio communication system” that rely on a legacy transmission technology

1 Cellular South Petition for Waiver, GN Docket No. 15-178 (filed Nov. 23, 2015) (Cellular South Petition for
Waiver).

2 Cellular South’s petition specifies that it seeks a waiver “identical to and subject to the same conditions as the
waiver recently granted to AT&T and Verizon.” Id. at 1. See also AT&T Services, Inc. Petition for Waiver, PS
Docket Nos. 11-153, 10-255, WC Docket No. 04-36, CG Docket Nos. 03-123, 10-213, at 2 (filed June 12, 2015)
(AT&T Petition for Waiver); Petition for Waiver of Rules Requiring Support of TTY Technology, GN Docket 15-
178, Order, DA 15-1141, \_\_\_ FCC Rcd \_\_\_ (CGB PSHSB WTB WCB 2015) (AT&T TTY-RTT Transition Waiver
Order); Verizon Petition for Waiver, GN Docket No. 15-178 (filed Oct. 23, 2015) (Verizon Petition for Waiver);
Petition for Waiver of Rules Requiring Support of TTY Technology, GN Docket No. 15-178, Order, DA 15-1311, \_\_\_
FCC Rcd \_\_\_ (CGB PSHSB WTB WCB 2015) (Verizon TTY-RTT Transition Waiver Order).

called 5-level Baudot.<sup>3</sup> Individuals who are deaf, hard of hearing, deaf-blind, and speech disabled began relying on TTY technology in the 1970s as the only means by which they could send and receive text communications over the telephone network.<sup>4</sup> In response, the Commission has since adopted requirements for TTY technology to be supported by telecommunications and advanced communications services and devices.<sup>5</sup>

4. The Commission's rules contain several requirements for compatibility with TTY technology. Section 20.18(c) of the Commission's rules requires covered Commercial Mobile Radio Services (CMRS) providers to be capable of transmitting 911 calls from individuals who are deaf, hard of hearing, or speech disabled, through means other than mobile radio handsets, such as TTY technology.<sup>6</sup> Section 64.603 requires common carriers, including VoIP providers, to offer 711 abbreviated dialing access to traditional telecommunications relay services (TRS) via a voice telephone or TTY.<sup>7</sup> Additionally, sections 6.3(b), 7.3(b), and 14.21(d) generally require that telecommunications services and equipment and advanced communication services and equipment be capable of TTY connectability and TTY signal compatibility.<sup>8</sup>

### **B. The Waiver Petitions**

5. On June 12, 2015, AT&T filed a petition requesting that the Commission initiate a rulemaking proceeding to authorize the substitution of a newer form of text communication, real-time text (RTT), as an alternative accessibility solution to TTY technology for use in the IP-based environment.<sup>9</sup>

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<sup>3</sup> See 47 C.F.R. § 64.601(a)(33).

<sup>4</sup> Harry G. Lang, *A Phone of Our Own: The Deaf Insurrection Against Ma Bell* at 1-8, 116-29 (2000).

<sup>5</sup> See, e.g., 47 C.F.R. §§ 6.3(b), 6.5, 7.3(b), 7.5, 14.20, 14.21(d), 20.18(c), 64.603. These rules were adopted pursuant to various sections of the Communications Act. See, e.g., 47 U.S.C. §§ 225 (requiring telecommunications relay services), 255 (requiring access to telecommunications products and services), 617 (requiring access to advanced communications products and services).

<sup>6</sup> 47 C.F.R. § 20.18(c).

<sup>7</sup> See *IP-Enabled Services; Implementation of Sections 255 and 251(a)(2) of the Communications Act of 1934, as Enacted by The Telecommunications Act of 1996: Access to Telecommunications Service, Telecommunications Equipment and Customer Premises Equipment by Persons with Disabilities; Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities; The Use of N11 Codes and Other Abbreviated Dialing Arrangements*, WC Docket No. 04-36, WT Docket No. 96-198, CG Docket No. 03-123 CC Docket No. 92-105, Order and Public Notice Seeking Comment, 22 FCC Rcd 18319, 18320, para. 1 (2007). See generally 47 C.F.R. §§ 64.601(1), (15), 64.603; *Use of N11 Codes and Other Abbreviated Dialing Arrangements*, CC Docket No. 92-105, Second Report and Order, 15 FCC Rcd 15188, 15191, para. 3 (2000) (*711 Order*). TRS are "telephone transmission services that provide the ability for an individual who is deaf, hard of hearing, deaf-blind, or who has a speech disability to engage in communication by wire or radio with one or more individuals, in a manner that is functionally equivalent to the ability of a hearing individual who does not have a speech disability to communicate using voice communication services by wire or radio." See 47 U.S.C. § 225(a)(3). The Commission adopted 711 dialing access so that TRS users could initiate a relay call, anywhere in the United States, without having to remember and dial different 7- and 10-digit toll free numbers when traveling from state to state. *711 Order*, 15 FCC Rcd at 15191, para. 3.

<sup>8</sup> 47 C.F.R. §§ 6.3(b), 7.3(b), 14.21(d). For example, telecommunications, voicemail, and interactive menu services, as well as the equipment used with these services, must be compatible with peripheral devices and specialized customer premises equipment commonly used by individuals with disabilities to achieve accessibility to telecommunications services, if readily achievable. *Id.* §§ 6.3(b), 6.5, 7.3(b), 7.5. Such compatibility is defined to include ensuring TTY connectability and TTY signal compatibility. *Id.* §§ 6.3(b)(3)-(4), 7.3(b)(3)-(4). Similarly, advanced communications services and equipment must ensure TTY connectability and TTY signal compatibility, unless compliance is not achievable. *Id.* §§ 14.20, 14.21(a), (d)(3)-(4).

<sup>9</sup> Petition of AT&T Services, Inc. for Rulemaking, PS Docket Nos. 11-153, 10-255, WC Docket No. 04-36, CG Docket Nos. 03-123, 10-213 (filed June 12, 2015) (AT&T Petition for Rulemaking).

AT&T simultaneously requested that the Commission temporarily waive the Commission's requirements to support TTY technology for wireless devices and services on Voice over Internet Protocol (VoIP) networks "during the pendency of the rulemaking and until RTT is fully deployed to allow [AT&T] to offer VoIP services that do not reliably support TTY."<sup>10</sup> AT&T's request cited a number of limitations characteristic of TTY technology on an IP platform, including "packet loss, distortion caused by echo cancellation and compression techniques, and bandwidth issues," that can impede or prevent the delivery of TTY messages on IP-based networks.<sup>11</sup>

6. On October 6, 2015, after a public comment period, the Bureaus issued an order granting AT&T's petition for waiver.<sup>12</sup> The Bureaus based this determination on reports of technical challenges to reliable TTY transmissions over IP networks,<sup>13</sup> the history of declining TTY use with wireless services,<sup>14</sup> and the long-term benefits of allowing the development and deployment of VoIP services using wireless technologies, together with new IP-based accessibility solutions that can enable the use of these technologies by people with disabilities.<sup>15</sup> However, because individuals with disabilities will be unable to access innovative IP-based wireless technologies during the waiver period, the Bureaus imposed certain conditions on the grant of the waiver.<sup>16</sup> The conditions described in the *TTY-RTT Transition Waiver Order*, as well as the reasons for imposing them, are similar to those adopted in earlier orders waiving the TTY requirements for emergency calling with respect to digital wireless services.<sup>17</sup>

7. In the *AT&T TTY-RTT Transition Waiver Order*, the Bureaus also concluded that additional information would be needed in order to determine whether to grant comparable waivers to other parties during their rollout of IP-based wireless technologies.<sup>18</sup> The Bureaus instructed any carrier or service provider seeking a waiver similar to that granted to AT&T to file a request describing the wireless services it provides, explaining the difficulties it has encountered or expects to encounter in providing connectivity to TTY devices over wireless IP networks, stating the extent to which it expects that it will be able to deploy accessible text alternatives to TTY technology by December 31, 2017,<sup>19</sup> and committing to compliance with the reporting requirements and other conditions stated in the *TTY-RTT Transition Waiver Order*.<sup>20</sup> The Bureaus indicated that they would look most favorably on waiver requests that also specify with sufficient particularity the following: (1) steps the carrier is taking or intends to take to ensure that the accessibility text alternatives that it intends to deploy will be accessible to people with communication disabilities, interoperable with other IP-based wireless text services, and backward compatible with TTYs; and (2) well-documented timetables and milestones regarding the

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<sup>10</sup> AT&T Petition for Waiver at 2.

<sup>11</sup> *Id.* at 5.

<sup>12</sup> *AT&T TTY-RTT Transition Waiver Order*. Commenters to the AT&T petition uniformly supported the grant of AT&T's waiver. *Id.*, para. 6.

<sup>13</sup> *Id.*, para. 9.

<sup>14</sup> *Id.*, para. 10.

<sup>15</sup> *Id.*, para. 14. *See also id.*, paras. 9-16 (discussing the public benefits of granting a waiver).

<sup>16</sup> *Id.*, para. 17. Consumers who currently rely on TTYs will not have the ability to access next-generation wireless networks for the duration of the waiver. *Id.*

<sup>17</sup> *Id.* *See also, e.g., Revision of the Commission's Rules To Ensure Compatibility with Enhanced 911 Emergency Calling Systems*, CC Docket No. 94-102, RM-8143, Memorandum Opinion and Order, 12 FCC Rcd 22665 (1997) (*1997 Commission Waiver Order*); Order, 12 FCC Rcd 20224 (WTB 1997); Order, 14 FCC Rcd 694 (WTB 1998).

<sup>18</sup> *AT&T TTY-RTT Transition Waiver Order*, para. 22.

<sup>19</sup> *Id.* The Bureaus stated that, to the extent that an applicant believes it will require a longer waiver period, it should provide a detailed justification for such additional period. *Id.* n.88.

<sup>20</sup> *Id.*, para. 22.

implementation of these capabilities.<sup>21</sup> The Bureaus cautioned that they anticipated that all conditions imposed by the *AT&T TTY-RTT Transition Waiver Order* with respect to AT&T would be applied to waivers granted to other parties.<sup>22</sup>

8. Subsequently, on October 23, 2015, Verizon filed a petition to request a waiver of any applicable TTY-related requirements for its IP-enabled wireless services, subject to the same customer notification, progress reporting, and duration conditions applied to AT&T.<sup>23</sup> On November 13, 2015, the Bureaus granted the waiver, with conditions similar to those imposed by the *AT&T TTY-RTT Transition Waiver Order*. In addition, the Bureaus required Verizon to file with the Commission, within 90 days of the date of the Order, a preliminary report describing, with greater specificity than was provided in its petition, its initial plans for meeting its commitment to develop and deploy RTT or an alternative text-based solution that is accessible, interoperable with other carriers' accessibility solutions, and backward compatible with TTY technology.<sup>24</sup> This additional condition was imposed to obtain specific evidence of Verizon's plans to develop and deploy an interoperable accessibility solution for the IP environment during the waiver period, which the Bureaus explained had been lacking from Verizon's more general commitment to deploy such solution, made in its Petition for Waiver.

9. Cellular South's petition, which seeks the same waiver relief as the Bureaus granted to AT&T and Verizon, explains that Cellular South is "part of a diversified telecommunications and technology services company that offers a comprehensive suite of wireless communications, high-speed Internet access and a range of other telecommunications products and services to consumers and businesses in the Southeastern United States."<sup>25</sup> Cellular South states it "will offer IP-based advanced calling services that enable VoIP calling and other advanced features that hold great potential for the usability of IP-enabled wireless services and devices for the deaf and hard-of-hearing."<sup>26</sup> Like AT&T and Verizon, Cellular South announces "plans to deploy RTT as a successor technology to TTY since, unlike TTY, RTT will work reliably in an IP environment."<sup>27</sup> Cellular South also states that it will comply with all the conditions required of AT&T and Verizon.<sup>28</sup> Specifically:

Cellular South agrees to inform its customers through multiple channels that TTY is not supported on these services for calls to 911 and inform customers of alternative means to reach 911 services. Cellular South will also inform the Commission and customers of its progress toward the deployment of RTT as described in the *AT&T Waiver Order*. Finally, Cellular South will file, within 90 days of the grant of the waiver request, "a preliminary report . . . describing . . . its initial plans for meeting its commitment to develop and deploy RTT or an alternative text-based solution that is accessible, interoperable with other carriers' accessibility solutions, and backward compatible with TTY technology."<sup>29</sup>

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<sup>21</sup> *Id.*

<sup>22</sup> *Id.*

<sup>23</sup> Verizon Petition for Waiver.

<sup>24</sup> *Verizon TTY-RTT Transition Waiver Order*, para. 13.

<sup>25</sup> Cellular South Petition for Waiver at 2.

<sup>26</sup> *Id.*

<sup>27</sup> *Id.*

<sup>28</sup> *Id.* at 2-3.

<sup>29</sup> *Id.* at 3 (footnotes omitted).

### III. DISCUSSION

10. A Commission rule may be waived for “good cause shown.”<sup>30</sup> In particular, a waiver is appropriate where the particular facts make strict compliance inconsistent with the public interest.<sup>31</sup> In addition, we may take into account considerations of hardship, equity, or more effective implementation of overall policy on an individual basis.<sup>32</sup> Such a waiver is appropriate if special circumstances warrant a deviation from the general rule and such deviation will serve the public interest.<sup>33</sup>

11. We find that good cause has been demonstrated to grant Cellular South’s request for a temporary waiver of the rules requiring that TTY technology be supported for IP-based wireless services, subject to the conditions set forth in this Order.<sup>34</sup> Specifically, we are persuaded that Cellular South is similarly situated to AT&T and Verizon with respect to its need for a waiver. As holds true for AT&T and Verizon and for the reasons enumerated in the *AT&T TTY-RTT Transition Waiver Order*, we are persuaded that the Commission’s goals of ensuring access to communications services specifically for individuals with disabilities and more broadly for the general public, will be best served by granting a temporary limited waiver of the Commission’s TTY requirements for Cellular South’s wireless IP offerings, subject to the conditions set forth in this Order.<sup>35</sup>

12. Accordingly, we impose the same two conditions on Cellular South that were initially applied to AT&T in the *AT&T TTY-RTT Transition Waiver Order*<sup>36</sup> and later applied to Verizon in the *Verizon TTY-RTT Transition Waiver Order*.<sup>37</sup> First, within thirty days of the effective date of the waiver<sup>38</sup> and throughout the waiver period, Cellular South must apprise its customers, through effective and accessible channels of communication, including via Cellular South’s website, billing statements, promotional materials, communications with national consumer organizations, and other effective means of communications, that (1) TTY technology will not be supported for calls to 911 services over IP-based wireless services;<sup>39</sup> and (2) there are alternative public switched telecommunications network (PSTN)-based and IP-based accessibility solutions for people with communication disabilities for such calls. As part of meeting clause (2) of this condition, to the extent that Cellular South begins to make RTT available, it must ensure that all 911 calls made by persons seeking emergency assistance using this

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<sup>30</sup> 47 C.F.R. § 1.3.

<sup>31</sup> *Northeast Cellular Tel. Co. v. FCC*, 897 F.2d 1164, 1166 (D.C. Cir. 1990).

<sup>32</sup> *WAIT Radio v. FCC*, 418 F.2d 1153, 1159 (D.C. Cir. 1969), *cert. denied*, 409 U.S. 1027 (1972); *Northeast Cellular*, 897 F.2d at 1166.

<sup>33</sup> *Northeast Cellular*, 897 F.2d at 1166.

<sup>34</sup> The rules subject to this waiver include sections 6.5, 7.5, 14.20, 14.21, 20.18(c) and 64.603 of the Commission’s rules. 47 C.F.R. §§ 6.5, 7.5, 14.20, 14.21, 20.18(c), 64.603. *See supra*, n.5.

<sup>35</sup> *See AT&T TTY-RTT Transition Waiver Order*, paras. 8-16. As we clarified in the *AT&T RTT-TTY Transition Waiver Order* (para. 13 n.47), we remind Cellular South that nothing in this Order waives or otherwise limits Cellular South’s obligations under section 214(a) of the Act, pursuant to which “[n]o carrier shall discontinue, reduce, or impair service to a community, or part of a community, unless and until there shall first have been obtained from the Commission a certificate that neither the present nor future public convenience and necessity will be adversely affected thereby.” 47 U.S.C. § 214(a).

<sup>36</sup> *See AT&T TTY-RTT Transition Waiver Order*, paras. 18-19. Cellular South agrees to comply with these conditions. Cellular South Petition for Waiver at 3.

<sup>37</sup> *Verizon TTY-RTT Transition Waiver Order*, para. 14.

<sup>38</sup> That is, this notification condition must be implemented by January 17, 2016.

<sup>39</sup> *See generally 1997 Commission Waiver Order*, 12 FCC Rcd at 22695, para. 60 (“Carriers whose systems are not compatible with TTY calls must make every reasonable effort to notify current and potential subscribers that they will not be able to use TTYs to call 911 with digital wireless devices and services.”).

technology are delivered in accordance with the obligations of all telecommunications carriers, including wireless carriers, to transmit 911 calls to the appropriate PSAP or local emergency authority.<sup>40</sup> The required notice must be prominently placed and in plain language on Cellular South's website and in the materials described above. It must further include a listing of text-based alternatives to 911, including, but not limited to, TTY capability over the PSTN, various forms of PSTN-based and IP-based TRS,<sup>41</sup> and text-to-911 (where available). The provision of this information is necessary to ensure that, during the waiver period, there is no expectation on the part of consumers with disabilities that TTY technology will be supported by IP-based wireless services, and to ensure that these consumers know that alternative accessible telecommunications options exist.

13. Second, once every six months, Cellular South is required to file a report with the Commission, and also inform its customers, through the same channels set forth above, regarding its progress toward and the status of the availability of new IP-based accessibility solutions, such as RTT.<sup>42</sup> Such reports shall include, but not be limited to, information on the interoperability of Cellular South's selected accessibility solution with the technologies deployed or to be deployed by other carriers and service providers, as well as the backward compatibility of such solution with TTYs. The information on such capabilities of Cellular South's IP-based accessibility solutions, including RTT, must include a showing of Cellular South's efforts to ensure delivery of 911 calls to the appropriate PSAP.<sup>43</sup> Additionally, Cellular South must continue to coordinate with PSAPs on implementing text-to-911 service. To the extent there are obstacles to achieving interoperability with other providers' solutions and compatibility with TTYs, the report shall describe such obstacles in detail, state what steps are being taken to overcome them, and provide an estimated timetable for the successful deployment of accessibility solutions.<sup>44</sup> The first of these reports shall be due to the Commission on June 20, 2016.

14. In addition to the above conditions, we impose a third condition on Cellular South. In considering how to proceed with respect to potential applicants seeking a waiver from the TTY requirements, we indicated in the *AT&T TTY-RTT Transition Waiver Order* that we would look most favorably on petitions that specify with sufficient particularity the "steps the carrier is taking or intends to take to ensure that the accessibility text alternatives that it intends to deploy will be accessible to people with communication disabilities, interoperable with other IP-based wireless text services, and backward compatible with TTYs," along with well-documented timetables and milestones regarding their implementation.<sup>45</sup> As with Verizon, although Cellular South's petition asserts its commitment to develop and deploy an interoperable accessibility text solution for the IP environment during the waiver period, to date we have not seen specific evidence of Cellular South's plans for developing and deploying such an accessibility solution. Therefore, as we required of Verizon, in addition to the conditions specified above, we require that Cellular South file, within 90 days of the date of this Order,<sup>46</sup> a preliminary report with the Commission describing, with greater specificity than is provided in its petition, its initial plans for meeting its commitment to develop and deploy RTT or an alternative text-based solution that is

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<sup>40</sup> See 47 C.F.R. §§ 64.3000, 64.3001. See also *AT&T TTY-RTT Transition Waiver Order*, para. 18 n.71.

<sup>41</sup> See *AT&T TTY-RTT Transition Waiver Order*, para. 18 n.71.

<sup>42</sup> See *id.*, para. 19 n.72.

<sup>43</sup> See *id.*, paras. 18-19.

<sup>44</sup> For example, if applicable, such report should include the percentage of Cellular South's network that is to be covered by a successful solution at each stage of the timetable. See *id.*, para. 19 n.74.

<sup>45</sup> *Id.*, para. 22.

<sup>46</sup> 90 days from the date of this Order is March 17, 2016.

accessible, interoperable with other carriers' accessibility solutions, and backward compatible with TTY technology.<sup>47</sup>

15. *Waiver Duration.* Cellular South requests that the waiver duration be identical to the waiver duration granted to AT&T and Verizon.<sup>48</sup> In the *AT&T TTY-RTT Waiver Order*, we concluded that it is in the public interest for the waiver granted to AT&T to expire on December 31, 2017, or upon the effective date of rules providing for alternative IP-based accessibility solutions, whichever is earlier.<sup>49</sup> For the same reasons, by this order, the duration of the waiver to Cellular South shall expire on the sooner of December 31, 2017, or the effective date of rules providing for alternative IP-based accessibility solutions.

16. In conclusion, we believe that there is good cause to waive temporarily its rules requiring that TTY technology be supported for Cellular South's IP-based wireless services. We thus grant the temporary waiver requested by Cellular South subject to the specific conditions set forth above, until December 31, 2017, or upon the effective date of rules providing for alternative IP-based wireless accessibility solutions, whichever is earlier. This waiver does not impact or cover requirements for the support of TTY technology for any wireline services or for any wireless services not offered on an IP network.<sup>50</sup>

#### IV. ORDERING CLAUSES

17. Accordingly, IT IS ORDERED that, pursuant to the authority contained in sections 4(i), 4(j), 225, 255, and 617 of the Communications Act of 1934, as amended, 47 U.S.C. §§ 154(i), 154(j), 225, 255, 716, and sections 0.91, 0.131, 0.141, 0.191, 0.291, 0.361, 0.392, 0.331, and 1.3 of the Commission's rules, 47 C.F.R. §§ 0.91, 0.131, 0.141, 0.191, 0.291, 0.361, 0.392, 0.331, 1.3, this Order is ADOPTED.

18. IT IS FURTHER ORDERED that the Petition for Waiver, filed by Cellular South on November 23, 2015, IS GRANTED to the extent described herein.

19. IT IS FURTHER ORDERED that the temporary waiver of sections 6.5, 7.5, 14.20, 20.18(c), and 64.603 of the Commission's rules, 47 C.F.R. §§ 6.5, 7.5, 14.20, 20.18, 64.603, and any other Commission rules that require support of TTY technology as an accessible solution for VoIP networks, SHALL BE EFFECTIVE upon release, and SHALL EXPIRE December 31, 2017, or upon the effective date of rules providing for alternative IP-based accessibility solutions, whichever is earlier.

20. To request materials in accessible formats (such as Braille, large print, electronic files, or audio format), send an e-mail to [fcc504@fcc.gov](mailto:fcc504@fcc.gov) or call the Consumer & Governmental Affairs Bureau at (202) 418-0530 (voice) or (202) 418-0432 (TTY).

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<sup>47</sup> As noted above, Cellular South already has indicated a willingness to comply with this condition. Cellular South Petition for Waiver at 3.

<sup>48</sup> *Id.* at 3.

<sup>49</sup> See *AT&T TTY-RTT Transition Waiver Order*, para. 21.

<sup>50</sup> See *id.*, para. 23.

FEDERAL COMMUNICATIONS COMMISSION

Alison Kutler  
Acting Chief  
Consumer and Governmental Affairs Bureau

David G. Simpson  
Rear Admiral, USN (ret)  
Chief, Public Safety and Homeland Security Bureau

Roger Sherman  
Chief  
Wireless Telecommunications Bureau

Matthew S. DelNero  
Chief  
Wireline Competition Bureau