



PUBLIC NOTICE

Federal Communications Commission
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DA 17-197

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**CONSUMER AND GOVERNMENTAL AFFAIRS BUREAU SEEKS COMMENT ON
T-MOBILE USA, INC. PETITION FOR CLARIFICATION OR, IN THE ALTERNATIVE
RECONSIDERATION OF THE COMMISSION'S REAL-TIME TEXT ORDER
CG Docket No. 16-145; GN Docket No. 15-178**

**Comments Date: [15 days after the date of publication in the Federal Register]
Reply Comments Date: [10 days after the time for filing comments has expired]**

With this Public Notice, the Consumer and Governmental Affairs Bureau (Bureau or CGB) of the Federal Communications Commission (Commission or FCC) seeks comment on a petition for clarification or, in the alternative, reconsideration filed by T-Mobile USA, Inc. (T-Mobile).¹ T-Mobile seeks clarification of the obligation, adopted by the Commission in its *Real-Time Text (RTT) Order*, for wireless carriers to deliver calls to Public Safety Answering Points (PSAPs) using an Emergency Services Internet Protocol Network (ESINet).² Specifically, T-Mobile requests that the Commission clarify that it did not intend to change the way carriers deliver calls to PSAPs using an ESINet.³ To the extent the Commission intended to shift the burden of conversion of RTT to TTY from the ESINet to wireless carriers, T-Mobile alternatively seeks reconsideration of that determination and requests that the Commission refrain from placing this obligation on wireless carriers.⁴

Pursuant to section 1.429 of the Commission's rules, 47 CFR § 1.429, we invite interested parties to file and serve comments on the petition and reply comments on or before the dates specified above. All filings must reference CG Docket No. 16-145 and GN Docket No. 15-178.

Comments may be filed using the Commission's Electronic Comment Filing System (ECFS). See *Electronic Filing of Documents in Rulemaking Proceedings*, 63 FR 24121 (1998).

- Electronic Filers: Documents may be filed electronically using the Internet by accessing ECFS: <https://www.fcc.gov/ecfs/>.
- Paper Filers: Parties who choose to file by paper must file an original and one copy of each filing.

¹ Petition of T-Mobile USA, Inc. for Clarification or, in the Alternative, Reconsideration, CG Docket No. 16-145; GN Docket No. 15-178 (filed Feb. 24, 2017), [https://ecfsapi.fcc.gov/file/102231846629100/T-Mobile%20RTT%20Petition%20for%20Clarification%20\(2-22-17\)%20FINAL.pdf](https://ecfsapi.fcc.gov/file/102231846629100/T-Mobile%20RTT%20Petition%20for%20Clarification%20(2-22-17)%20FINAL.pdf) (T-Mobile Petition).

² See *Transition from TTY to Real-Time Text Technology; 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*, Report and Order and Further Notice of Proposed Rulemaking, 31 FCC Rcd 13568, 13593-94, paras. 46-47 (2016) (*RTT Order*).

³ T-Mobile Petition at 5.

⁴ *Id.*

- Filings can be sent by hand or messenger delivery, by commercial overnight courier, or by first-class or overnight U.S. Postal Service mail. All filings must be addressed to the Commission's Secretary, Office of the Secretary, Federal Communications Commission.
- All hand-delivered or messenger-delivered paper filings for the Commission's Secretary must be delivered to FCC Headquarters at 445 12th St., SW, Room TW-A325, Washington, DC 20554. The filing hours are 8:00 a.m. to 7:00 p.m. All hand deliveries must be held together with rubber bands or fasteners. Any envelopes and boxes must be disposed of before entering the building.
- Commercial overnight mail (other than U.S. Postal Service Express Mail and Priority Mail) must be sent to 9300 East Hampton Drive, Capitol Heights, MD 20743.
- U.S. Postal Service first-class, Express, and Priority mail must be addressed to 445 12th Street, SW, Washington DC 20554.

To request materials in accessible formats for people with disabilities (Braille, large print, electronic files, audio format), send an e-mail to fcc504@fcc.gov or call the Consumer and Governmental Affairs Bureau at 202-418-0530 (voice), 844-432-2275 (videophone), or 202-418-0432 (TTY).

For further information, please contact Michael Scott, Consumer and Governmental Affairs Bureau, Federal Communications Commission, Disability Rights Office at (202) 418-1264 or e-mail at Michael.Scott@fcc.gov.

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