



# PUBLIC NOTICE

Federal Communications Commission  
445 12<sup>th</sup> St., S.W.  
Washington, D.C. 20554

News Media Information 202 / 418-0500  
Internet: <https://www.fcc.gov>  
TTY: 1-888-835-5322

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## CONSUMER AND GOVERNMENTAL AFFAIRS BUREAU INVITES COMMENT ON A PETITION FILED BY GENERAL MOTORS HOLDING LLC FOR PARTIAL WAIVER OF REAL-TIME TEXT MINIMUM FUNCTIONALITY REQUIREMENTS

GN Docket No. 15-178

**Comment Date: January 25, 2019**

**Reply Comment Date: February 11, 2019**

With this Public Notice, the Consumer and Governmental Affairs Bureau of the Federal Communications Commission (Commission or FCC) invites comment on a petition for waiver filed by General Motors Holding LLC and all of its affiliates and subsidiaries (GM). GM's petition requests partial waiver of certain minimum functionality requirements for real-time text (RTT) that will be used in its autonomous-vehicle ride-hailing service.<sup>1</sup> Specifically, GM states that it intends to provide an RTT chat application to achieve accessibility for the customer support function of its service, which is currently in development.<sup>2</sup> According to GM, because its non-interconnected VoIP service can be used only to contact customer support,<sup>3</sup> the RTT customer-support application need not support the following minimum functionalities: RTT-RTT interoperability; RTT-TTY interoperability; transmission and receipt of RTT communications to and from any 911 public safety answering point; and simultaneous voice and text communications.<sup>4</sup>

*Filing Requirements.* Interested parties may file comments on or before the date indicated on the first page of this document.<sup>5</sup> All filings must reference GN Docket No. 15-178. Comments may be filed using the Commission's Electronic Comment Filing System (ECFS).<sup>6</sup>

- Electronic Filers: Comments may be filed electronically using the Internet by accessing ECFS: <https://www.fcc.gov/ecfs/>.

<sup>1</sup> Petition for Waiver of General Motors Holding LLC, GN Docket No. 15-178 (filed Dec. 11, 2018), <https://ecfsapi.fcc.gov/file/1211251984697/As-filed%20GM%20RTT%20waiver%2012-11-18.pdf> (GM Petition), seeking a waiver of certain requirements in section 67.2 of the Commission's rules.

<sup>2</sup> GM Petition at 1-2. The chat application would be offered in lieu of making the customer support function, which is provided via non-interconnected Voice over Internet Protocol (VoIP), compatible with TTY technology. See 47 CFR § 14.21(d)(5) (exempting covered interconnected and non-interconnected VoIP services that are provided over wireless IP facilities and equipment from the requirement to provide TTY connectability and TTY signal compatibility if such services and equipment support RTT, in accordance with 47 CFR part 67); GM Petition at 6-7.

<sup>3</sup> GM Petition at 2.

<sup>4</sup> GM Petition at 9; see also 47 CFR § 67.2.

<sup>5</sup> See 47 CFR § 1.1.

<sup>6</sup> See *Electronic Filing of Documents in Rulemaking Proceedings*, 63 FR 24121 (1998).

- Paper Filers: Parties who choose to file by paper must file an original and one copy of each filing.
  - 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 Street, 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 9050 Junction Drive, Annapolis Junction, MD 20701.
  - U.S. Postal Service first-class, Express, and Priority mail must be addressed to 445 12th Street, SW, Washington DC 20554.

*Ex Parte Rules.* The proceeding this Notice initiates shall be treated as a “permit-but-disclose” proceeding in accordance with the Commission’s *ex parte* rules.<sup>7</sup> Persons making *ex parte* presentations must file a copy of any written presentation or a memorandum summarizing any oral presentation within two business days after the presentation (unless a different deadline applicable to the Sunshine period applies). Persons making oral *ex parte* presentations are reminded that memoranda summarizing the presentation must (1) list all persons attending or otherwise participating in the meeting at which the *ex parte* presentation was made, and (2) summarize all data presented and arguments made during the presentation. If the presentation consisted in whole or in part of the presentation of data or arguments already reflected in the presenter’s written comments, memoranda or other filings in the proceeding, the presenter may provide citations to such data or arguments in his or her prior comments, memoranda, or other filings (specifying the relevant page and/or paragraph numbers where such data or arguments can be found) in lieu of summarizing them in the memorandum. Documents shown or given to Commission staff during *ex parte* meetings are deemed to be written *ex parte* presentations and must be filed consistent with rule 1.1206(b).<sup>8</sup> In proceedings governed by rule 1.49(f) or for which the Commission has made available a method of electronic filing, written *ex parte* presentations and memoranda summarizing oral *ex parte* presentations, and all attachments thereto, must be filed through the electronic comment filing system available for that proceeding, and must be filed in their native format (*e.g.*, .doc, .xml, .ppt, searchable .pdf).<sup>9</sup> Participants in this proceeding should familiarize themselves with the Commission’s *ex parte* rules.

*People with Disabilities.* 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](mailto:fcc504@fcc.gov) or call the Consumer and Governmental Affairs Bureau at 202-418-0530 (voice) or 202-418-0432 (TTY).

*Additional Information.* For further information regarding this Notice, please contact Michael Scott, Disability Rights Office, Consumer and Governmental Affairs Bureau, at 202-418-1264 or by e-mail to [Michael.Scott@fcc.gov](mailto:Michael.Scott@fcc.gov).

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<sup>7</sup> 47 CFR §§ 1.1200 *et seq.*

<sup>8</sup> *Id.* § 1.1206(b).

<sup>9</sup> *Id.* § 1.49(f).