



# PUBLIC NOTICE

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

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**DA 20-702**

**Released: July 1, 2020**

**CONSUMER AND GOVERNMENTAL AFFAIRS BUREAU SEEKS COMMENT ON  
PETITIONS BY CERTAIN MOBILE SERVICE PROVIDERS FOR WAIVERS OF DEADLINE  
TO SUPPORT REAL-TIME TEXT ON IP-BASED NETWORKS**

**CG Docket No. 16-145 and GN Docket No. 15-178**

**Comment Date: July 31, 2020**

**Reply Comment Date: August 17, 2020**

The Consumer and Governmental Affairs Bureau (CGB or Bureau) of the Federal Communications Commission (FCC or Commission) seeks comment on three petitions from or on behalf of non-tier I mobile providers concerning the deadline for such providers to support real-time text (RTT). In December 2016, the Commission began the transition from TTY technology to RTT, allowing mobile providers to support RTT in lieu of TTY technology in the provision of IP-based voice services.<sup>1</sup> The *RTT Order* established a June 30, 2020 deadline for non-tier I mobile providers to support RTT.<sup>2</sup>

The Competitive Carriers Association (CCA), on behalf of six participating members, requests a temporary waiver of the deadline for non-Tier I mobile providers to offer RTT in lieu of TTY technology on their IP-based networks or, in the alternative, a ruling that compliance with the accessibility requirements is not readily achievable by the deadline.<sup>3</sup> East Kentucky Network d/b/a Appalachian Wireless also requests a temporary extension of the deadline, or a ruling that compliance is not readily achievable.<sup>4</sup> Both CCA and EKN recommend that the Commission extend the waiver for each petitioner

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<sup>1</sup> *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 the Rules Requiring Support for TTY Technology*, CG Docket No. 16-145 and GN Docket No. 15-178, Report and Order and Further Notice of Proposed Rulemaking, 31 FCC Rcd 13568 (2016) (*RTT Order*).

<sup>2</sup> *RTT Order*, 31 FCC Rcd at 13602, para. 66. A mobile provider may achieve initial support for RTT by “either (1) offer[ing] a downloadable application or plugin that supports RTT or (2) comply[ing] with the following: (i) implement[ing] in its core network the capability to support RTT; (ii) offer[ing] at least one new handset that supports native RTT functionality, and (iii) for all authorized end user devices specified on or after that date, include[ing] in future design specifications the requirement to support RTT.” *Id.*

<sup>3</sup> Competitive Carriers Association (CCA), *Petition of Certain Members of Competitive Carriers Association for Waiver or, in the Alternative, Declaratory Ruling*, CG Docket No. 16-145 and GN Docket No. 15-178 (filed June 16, 2020), <https://ecfsapi.fcc.gov/file/1061682721453/REDACTED%20CCA%20RTT%20Petition.pdf> (CCA Petition) (redacted).

<sup>4</sup> East Kentucky Network, *Petition of Appalachian Wireless for Temporary Waiver of the TTY/RTT Transition Rules and Comments in Support of Competitive Carriers Association Request for Declaratory Ruling*, CG Docket No. 16-145 and GN Docket No. 15-178 (filed June 29, 2020),

(continued....)

to one year after the date the provider executes a contract with a network vendor for installation and deployment of RTT or the date COVID-19-related access restrictions that interfere with deployment are lifted, whichever is later.<sup>5</sup> US Cellular seeks a waiver of rules requiring use of RTT in lieu of TTY on IP-based networks and an extension of the deadline to December 31, 2020.<sup>6</sup>

*Filing Requirements.* Interested parties may file comments on or before the date indicated on the first page of this document.<sup>7</sup> 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).<sup>8</sup>

- Electronic Filers: Comments 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.
- Filings can be sent 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.
- 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.
- **Effective March 19, 2020, and until further notice, the Commission no longer accepts any hand or messenger delivered filings at the Commission's headquarters. This is a temporary measure taken to help protect the health and safety of individuals, and to mitigate the transmission of COVID-19. See *FCC Announces Closure of FCC Headquarters Open Window and Change in Hand-Delivery Policy*, Public Notice, DA 20-304 (March 19, 2020), <https://www.fcc.gov/document/fcc-closes-headquarters-open-window-and-changes-hand-delivery-policy>.<sup>9</sup>**

*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>10</sup> Persons making *ex parte* presentations must file a copy of any written presentation or a memorandum summarizing any oral presentation within

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<https://ecfsapi.fcc.gov/file/1062922067116/Appalachian%20Wireless%20--%20Petition%20for%20Waiver%20of%20RTT-TTY%20Deadline%20--%2006.29.20.pdf> (EKN Petition).

<sup>5</sup> CCA Petition at 6-7; EKN Petition at 2.

<sup>6</sup> United States Cellular Corp., Request for Waiver and Extension of Time, CG Docket No. 16-165 and GN Docket No. 15-178 (filed June 22, 2020) <https://ecfsapi.fcc.gov/file/106220725514520/US%20Cellular%20Request%20for%20Waiver%20and%20Extension%20of%20Time%20-%20FINAL%20REDACTED%20VERSION%20AS%20FILED.pdf> (US Cellular Petition) (redacted).

<sup>7</sup> See 47 CFR §§ 1.1, 1.45, 1.49.

<sup>8</sup> *Electronic Filing of Documents in Rulemaking Proceedings*, GC Docket No. 97-113, Report and Order, 13 FCC Rcd 11322 (1998).

<sup>9</sup> The FCC's Managing Director has established a new filing location for hand-carried documents that will take effect when the Order is published in the Federal Register. See *Amendment of the Commission's Rules of Practice and Procedure*, Order, DA 20-562 (OMD May 28, 2020), <https://docs.fcc.gov/public/attachments/DA-20-562A1.pdf>.

<sup>10</sup> 47 CFR §§ 1.1200 *et seq.*

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). 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). 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 Bureau at 202-418-0530 (voice).

*Additional Information.* For further information regarding this Notice, please contact William Wallace, Disability Rights Office, Consumer and Governmental Affairs Bureau, at 202-418-2716 or by e-mail to [William.Wallace@fcc.gov](mailto:William.Wallace@fcc.gov).

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