

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

In the Matter of)	
)	
Transition from TTY to Real-Time Text Technology)	CG Docket No. 16-145
)	
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 the Rules Requiring the Support of TTY Technology)	GN Docket No. 15-178
)	
Inland Cellular)	
)	

ORDER

Adopted: January 12, 2022

Released: January 12, 2022

By the Chief, Consumer and Governmental Affairs Bureau:

1. By this Order, the Consumer and Governmental Affairs Bureau (Bureau) of the Federal Communications Commission (Commission) grants Inland Cellular (Inland) leave to withdraw a pending waiver request.¹

2. In 2016, in response to a request by the Competitive Carriers Association (CCA) on behalf of certain CCA members, the Commission granted such CCA members, including Inland, temporary, partial waivers of certain provisions of the Commission's rules that require support for text telephone (TTY) technology.² These requirements were conditionally waived for Inland through December 31, 2017, to the extent that they require Inland to support TTY technology when providing voice communication service on an Internet Protocol (IP) based network.³ The Commission subsequently amended its rules to allow service providers to support real-time text (RTT) technology in lieu of

¹ Letter from Mike Bly, Inland Cellular, to Marlene H. Dortch, FCC, CG Docket No. 16-145 and GN Docket No. 15-178 (filed Sept. 1, 2021) (Withdrawal Letter). Inland, a Commercial Mobile Radio Service (CMRS) provider, offers voice and data services to customers in Washington and Idaho. See Letter from Mike Bly, Inland Cellular, to Suzy Rosen Singleton, FCC, CG Docket No. 16-145 and GN Docket No. 15-178, at 3-4 (filed Jan. 21, 2021) (January 21 Supplement).

² See *Petition for Waiver of Rules Requiring Support of TTY Technology; Competitive Carriers Association*, GN Docket No. 15-178, Order, 31 FCC Rcd 3778 (CGB PSHSB WTB WCB 2016) (*CCA Waiver Order*). The rules subject to partial waiver were 47 CFR §§ 6.5(b), 7.5(b), 14.20(a), 20.18(c) (now 9.10(c)), and 64.603. The waivers granted in the *CCA Waiver Order* applied to all CCA members that chose to opt in by July 19, 2016. *Id.* at 3785, para. 21. CCA identified Inland as one of its members opting in. See CCA, Report, GN Docket No. 15-178, Attach. A, at 13 (filed July 19, 2016).

³ See *CCA Waiver Order*, 31 FCC Rcd at 3778, 3785, paras. 1, 21.

supporting TTY, and extended to June 30, 2020, the expiration date of all TTY support waivers previously granted to non-Tier I CMRS providers, including Inland.⁴

3. On June 16, 2020, on behalf of certain CCA members, including Inland, CCA requested a further extension of the June 30, 2020, expiration date of the TTY support waivers for non-Tier I service providers.⁵ Subsequently, Inland submitted additional information to the Commission regarding this request.⁶ On September 1, 2021, Inland filed a letter stating that it withdraws its request for a further extension.⁷ According to Inland's letter, it "has not launched VoLTE service yet, and because we will roll out RTT service at the same time as our VoLTE service, a waiver of the RTT requirement is not necessary."⁸

4. We grant Inland leave to withdraw its request. The waivers previously granted are only applicable if Inland provides voice service on an IP network.⁹ Further, under the rule amendments adopted by the Commission in 2016, once Inland *does* begin to provide VoLTE or another voice service on an IP network, it may elect to support RTT in lieu of supporting TTY technology.¹⁰ Therefore, extension of the waivers previously granted to Inland is only necessary to avoid non-compliance with our rules if Inland is (or will be) providing voice service on an IP network *without* supporting RTT.¹¹ According to Inland's supplemental filings, its initial plan to launch VoLTE service was delayed, and it does not intend to begin providing voice service over an IP network until it is ready to launch its RTT capability.¹² Therefore, the record does not indicate any need to further extend Inland's waivers.¹³

5. Accordingly, IT IS ORDERED, pursuant to section 4(i) of the Communications Act of 1934, as amended, 47 U.S.C. § 154(i), and sections 0.141, 0.361, and 1.3 of the Commission's rules, 47 CFR §§ 0.141, 0.361, 1.3 that leave for Inland to withdraw its waiver extension request IS GRANTED.

⁴ *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*, CG Docket No. 16-145 and GN Docket No. 15-178, Report and Order and Further Notice of Proposed Rulemaking, 31 FCC Rcd 13568, 13572-74, 13602, paras. 7, 66 (2016) (*TTY-RTT Transition Order*).

⁵ *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, at 1-2, 6-7 (filed June 16, 2020), <https://ecfsapi.fcc.gov/file/1061682721453/REDACTED%20CCA%20RTT%20Petition.pdf> (CCA Waiver Extension Request) (redacted).

⁶ See January 21 Supplement.

⁷ Withdrawal Letter.

⁸ *Id.*

⁹ See *CCA Waiver Order*, 31 FCC Rcd at 3780-81, para. 7 (describing a request by AT&T for temporary waiver of "the Commission's requirements to support TTY technology for wireless devices and services on Voice over Internet Protocol (VoIP) networks"); *id.* at 3781, para. 9 (describing CCA request for "a waiver identical to that recently granted to AT&T").

¹⁰ See *TTY-RTT Transition Order*, 31 FCC Rcd at 13572-74, para. 6.

¹¹ See *id.* at 13602, para. 66.

¹² January 21 Supplement at 3-4.

¹³ In granting Inland leave to withdraw its request, we make no finding as to whether Inland is in compliance with the previously waived rules requiring support for TTY technology. Further, we note that a service provider intending to comply with such rules by supporting RTT technology in lieu of TTY technology, must ensure that its implementation of RTT conforms to all the requirements adopted by the Commission in the *TTY-RTT Transition Order*.

6. IT IS FURTHER ORDERED that the request for extension of Inland's waivers, filed June 16, 2020, IS DISMISSED.

FEDERAL COMMUNICATIONS COMMISSION

Patrick Webre
Chief,
Consumer and Governmental Affairs Bureau