

**STATEMENT OF  
COMMISSIONER AJIT PAI**

Re: *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 Rules Requiring Support of TTY Technology*, GN Docket No. 15-178, Report and Order and Further Notice of Proposed Rulemaking

This past spring, I had the chance to visit Gallaudet University and learn how real-time text (RTT) can improve the lives of people with hearing and speech disabilities. I met with Dr. Christian Vogler, the Director of Gallaudet's Technology Access Program, as well as Research Associate Paula Tucker and Senior Research Engineer Norman Williams. They showed me how superior RTT technologies are to the clunky and antiquated TTY systems that have been in use for decades.

One of RTT's advantages is that text is transmitted instantaneously. You don't need to type out an entire message and then press "send" or use an intermediary to communicate. Dr. Vogler explained that this allows for a more natural conversation, since you can see and anticipate what the other person is trying to say. You also can communicate much more quickly and efficiently. This is particularly important when it comes to public safety, since 911 exchanges that would take minutes using a legacy technology can be completed in seconds using RTT.

RTT has other benefits as well. It is based on the Internet Protocol, or IP, which means it is a highly adaptable digital technology. It is interoperable across networks and devices, which means that consumers do not need to find or, in some cases, purchase specialized equipment. And it is far more reliable than legacy offerings, which means those who use it can have comfort that it'll work in a moment of need.

In fact, there's really only one problem: FCC rules have not kept up with the pace of technological change. Despite RTT's clear consumer benefits, our rules have required carriers to continue to support legacy TTY systems. This has not only delayed the deployment of RTT, but has also held back the deployment of other services that consumers want—like Wi-Fi calling and Voice over LTE—because carriers found that they could not offer those services while meeting the FCC's TTY requirement.

Thankfully, this changes today. Our *Order* gives carriers the flexibility to invest in and deploy RTT instead of TTY. This, in turn, will enable consumers—particularly those with hearing and speech disabilities—to take advantage of the benefits of advanced IP technologies.

I want to thank my colleagues for working in good faith to find common ground on this item, and I want to express my gratitude to the advocates in the hearing and speech disability community for the work you have done to advance this cause.