

**STATEMENT OF
CHAIRMAN THOMAS E. WHEELER**

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, Notice of Proposed Rulemaking.

For the past three years the Commission's agenda has been guided by a set of over-arching goals that include ensuring accessibility, promoting public safety, accelerating the transition to IP-based technologies, updating outdated regulations, and encouraging market-driven solutions. Today's item to promote real-time text (RTT) checks every one of these boxes.

In the 20th century, the text telephone, or TTY, was a breakthrough for communications accessibility. For the past 50 years, people who are deaf, hard-of-hearing, speech-disabled and deaf-blind have been using TTYs to communicate by text over the phone. But TTY use has been declining steadily over the past decade. Consumer and industry stakeholders agree that this technology is outdated and slow. It was developed for use on the legacy public switched telephone network and doesn't work well in the IP environment. There are numerous technical challenges associated with supporting TTY transmissions over IP networks, including susceptibility to packet loss, distortion, and transmission errors, which degrade the quality of these communications.

If TTYs don't work in an IP-environment, how can we make sure that the population that uses this technology can continue to communicate over the telephone in real-time using text in the future? The answer proposed by consumers and industry is real-time text.

RTT allows text to be sent immediately as it is being created. It is unlike SMS or other text messaging services in that it does not require a party to a call to first complete a message and press "send" before the message is transmitted to its recipient. Because it allows text to be immediately conveyed as it is being composed, RTT is the only type of text communication that allows a natural flow of conversation akin to voice telephone calls, enabling call recipients to see what the sender is thinking as his or her thoughts are sent by text.

Real-time text is designed for today's IP networks, and it is considered to be superior to TTY technology with respect to its speed, latency, reliability, features, and ease of use. RTT can also be built right into off-the-shelf devices, such as smartphones, tablets, and computers that already have the ability to send, receive and display text – unlike TTYs, which are specialized assistive devices that have to be attached to phones via a coupler.

This compatibility with off-the-shelf devices will finally allow the millions of Americans who have been in the TTY "silo" to communicate in real-time over mainstream IP networks – just like the rest of the public. Not only can this reduce third-party relay services, it will enhance the independence and privacy of callers using RTT. When we talk about real-time text we are talking about an opportunity to integrate this population into our communications networks – an opportunity we should seize.

Among the chief benefits of RTT is that it can facilitate emergency communications by providing a reliable means of sending text communications to 911 services in an IP world. It also ensures that incomplete messages will be sent in an emergency, even if the 911 caller is cut off before pressing the "send" key. Bottom line, RTT technology can save lives, and takes a significant step in our migration to next generation 911 services.

Several wireless carriers, including AT&T and Verizon, have already made a commitment to deploy RTT as the successor technology to TTYs. In addition, public interest and industry stakeholders, along with the Commission's Disability Advisory Committee, have called for Commission action to facilitate RTT deployment.

Clearly, TTY is the past and real-time text is the future. It's time the FCC updated its rules to speed the transition to more accessible communications.

This is just the start of a proceeding, and we are seeking answers to a lot of questions. But our goal is to make sure that millions of Americans with disabilities who rely on text to communicate have accessible and effective telephone access as communications technologies make the transition from circuit-switched to IP-based technologies.