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March 27, 2001

Alliance for Telecommunications
Industry Solutions

*Problem Solvers to the
Telecommunications Industry*

VIA HAND DELIVERY

Magalie Roman Salas
Secretary
Federal Communications Commission
Office of the Secretary
445 12th Street, SW, Room TW-A325
Washington, DC 20554

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Re: *Ex Parte* **correspondence in CC Docket No. 94-102/**

Dear Ms. Salas:

ATIS submits this *ex parte* correspondence on behalf of its sponsored TTY Forum. The TTY Forum is an organization comprised of wireless carriers, equipment manufacturers, emergency relay service providers, and consumer organizations representing individuals who are deaf and hard-of-hearing. These comments are in response to the Commission's request for the TTY Forum to investigate the potential disruption of emergency communications when a consumer's Text Telephony (TTY) device utilizes proprietary enhanced communication protocols, such as Ultratec's Turbo Code (TC) and Ameriphones's HiSpeed, over digital, wireless air-interfaces.[1]
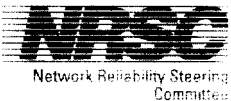
During the TTY Forum held in Washington, DC on November 9, 2001, Ultratec formally introduced the issue of proprietary, enhanced protocols. The written contribution explained that TC (like HiSpeed) has become a widely used TTY protocol by consumers, 9-1-1 and other emergency service providers over the past ten years largely due to the increased speed and features over the existing Baudot protocol.[2] The popularity of these proprietary, enhanced protocols has lead TTY manufacturers to design their new products in such a way that the device defaults to these proprietary, enhanced protocols when first turned on by the user. To switch back to the common, slower signaling protocol of Baudot[3] requires specific intervention by the user. The contribution further suggested that these proprietary, enhanced TTY protocols should be endorsed by the TTY Forum in the same manner the Forum endorsed Baudot signaling at the first TTY Forum meeting in 1996. To endorse TC and HiSpeed would require the development of new technical solutions that would allow consumers to used either TC, HiSpeed or Baudot.

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[1] FCC Fourth Report and Order, CC Docket No. 94-102, released December 14, 2000.
[2] TTY Contribution No. TTYForum16/00.11.09.06
[3] TY Forum Agreement # 1 was to find a technical solution for the commonly used, ubiquitous 45.5 baud Baudot signaling protocol.

The Forum discussed the technical implications and manpower drain such a monumental undertaking would have on the TTY Forum and standards developing bodies, and the detrimental impact it would have on completing the Baudot solution currently being developed and tested to meet the mandate implementation date of June 30, 2002. The Forum further identified that proprietary designs may not be developed into open industry standards thus, identifying the added requirement that the proprietary protocols would first have to be standardized by TTY manufacturers. Based on these discussions the following two Forum Agreements were reached:

> 16.3   TTY Forum members find that it is not within the scope and purview (of the TTY Forum) to address the enhanced protocol issue at this time. However the chair will pass the concept and recommendation to Standards Developing Organizations (SDO) T1P1 and TR 45.[4]

> 16.4   A working group will be created to explore the e-protocol issue. There will be an effort to ensure that all industry sectors are represented.[5]

At the subsequent meeting of the TTY Forum held in Washington, DC on March 14, 2001 the Enhanced Protocol Working Group reported that both TTY Manufacturers, Ultratec and Ameriphone, agreed to alter those TTY products that are designed to default to TC or HiSpeed. The proprietary, enhanced protocol will automatically be switched "OFF" when the TTY device is connected directly to digital cellular phones via the audio jack. This procedure will allow the user to communicate over digital wireless systems accurately, and without system induced error, to 9-1-1 call takers, relays operators and other TTY users once the Baudot solution has been implemented and the mandate met.

Due to the approach taken by these TTY manufactures, the use of enhanced protocols on wireless digital networks will not be an issue for the foreseeable future. Consequently, the TTY Forum will continue to focus on finding and implementing technical solutions for Baudot signaling. The TTY Forum disbanded the Enhanced Protocol Working Group following the decision of the TTY Manufacturers and recommendation of the Enhanced Protocol Working Group. Therefore, the TTY Forum urges the Commission to reconsider its requirement to impose proprietary, enhanced TTY protocols on the industry.

If you have any questions, please contact me at (202) 434-8836 or by email at ehall@atis.org.

Sincerely,

Ed Hall
Vice President, Technology Development

cc: Megan Campbell, General Counsel

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[4] Agreement # 3 from TTY Forum 16
[5] Agreement # 4 from TTY Forum 16