



Rehabilitation Engineering Research Center on Mobile
Wireless Technologies for Persons with Disabilities

Wirelessrerc.org

250 14th Street, NW Room 541
Atlanta, GA 30318-0490

ph: (404) 894-8297
TDD/TTY: (404) 894-6568
Fax: (404) 894-1445

VIA ECFS

Marlene H. Dortch, Secretary
Office of the Secretary
Federal Communications Commission
445 12th Street, S.W.
TW-A325
Washington D.C. 20554

Re: *Telecommunications Relay Services and Speech-to-Speech Services for
Individuals with Hearing and Speech Disabilities, CG Docket No. 03-123*

Dear Ms. Dortch:

Enclosed for filing in the above referenced proceeding pursuant to the Commission's June 30, 2004 Report and Order, Order on Reconsideration, and Further Notice of Proposed Rulemaking ("TRS FNPRM"), are the Comments of the Rehabilitation Engineering Research Center on Mobile Wireless Technologies for Persons with Disabilities (Wireless RERC).

Should you have any questions concerning this filing, please do not hesitate to call me.

Respectfully submitted,

Helena Mitchell, Director *in consultation with*
Paul M.A. Baker, Associate Director, Policy Research,
Alan Bakowski, Research Associate, Rehabilitation Engineering Research Center on Mobile
Wireless Technologies for Persons with Disabilities (Wireless RERC),

Ed Price, Research Director, Interactive Media Technology Center (IMTC),

Dated this 18th day of October, 2004

Enclosure

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

Telecommunications Relay Service and)	
Speech-to-Speech Services for Individuals)	CC Docket No. 90-571
with Hearing and Speech Disabilities)	
)	CC Docket No. 98-67
)	
)	CG Docket No. 03-123
)	

COMMENTS OF
REHABILITATION ENGINEERING RESEARCH CENTER ON MOBILE WIRELESS
TECHNOLOGIES FOR PERSONS WITH DISABILITIES (WIRELESS RERC)

Introduction

The Rehabilitation Engineering Research Center on Mobile Wireless Technologies for Persons With Disabilities (Wireless RERC), in accordance with the Federal Communications Commission's (FCC's) June 30, 2004 Report and Order, Order on Reconsideration, and Further Notice of Proposed Rulemaking (TRS FNPRM)¹, submits the following comments.

The Wireless RERC² is a research center focusing on promoting universal access to mobile wireless technologies and exploring their innovative applications in addressing the needs of people with disabilities.

In the initial round of comments, TDI, et. al, filed comments on the Commission's NPRM on technological and other issues surrounding the routing of wireless 711 calls.³ TDI, et.

¹ FCC 04-137

² The Rehabilitation Engineering Research Center on Mobile Wireless Technologies for Persons with Disabilities (Wireless RERC) is supported by the National Institute on Disability and Rehabilitation Research of the U.S. Department of Education, grant # H133E010804.

al., commented that affected parties should work together to develop the means through which emergency calls (via 711, 911 or a directly dialed number) to a TRS center are routed through to the same Public Safety Answering Point (PSAP) that would receive a directly dialed 911 call. They argued that wireless subscribers with speech or hearing disabilities should have the same expectations of level of service (handling via PSAP) when placing emergency calls that hearing wireless subscribers currently have, regardless of origination via 711, 911 or directly called numbers. The Wireless RERC believes that TDI et. al, make an important point regarding parity of service. We agree that as technology becomes available, wireless carriers should be required to provide 911/E911 information to TRS providers so that information can be passed along to the appropriate PSAP. We further agree that wireless providers should be required to provide the same 911/E911 information to TRS users that they provide for speaking/hearing subscribers.

Additionally the Wireless RERC concurs with TDI, et. al., that the Commission consider mandating that TRS vendors designate e-mail addresses for their facilities so that emergency messages may be sent via wireless text devices, and that those messages be directed to the appropriate PSAP. This is especially important for deaf people who may be users of text pagers and need a method to communicate in an emergency situation.⁴ We agree that current technology is sufficiently developed that it would be reasonable for the Commission to consider investigating the feasibility of requiring that pagers with Internet browsers be able to connect with IP Relay in order to contact hearing parties and other emergency services.

The Telecommunications Act of 1996 made provisions to provide persons with disabilities access to tools that would ensure they had access to emergency services. It is therefore important for the Commission to be sensitive in establishing and supporting emergency

³ *TRS FNPRM*, at ¶ 108-109.

⁴ The use of text pagers in this context could provide “equivalent functionality or outcome” per *TRS NPRM*, at ¶ 109. As TDI, et. al point out it would allow a call for “help,” similar to a hearing person’s use of a cell phone.

communications systems that can effectively assist persons with disabilities thus avoiding injury or loss of life.

Respectfully submitted,

Helena Mitchell, Director
Rehabilitation Engineering Research Center on Mobile
Wireless Technologies for Persons with Disabilities (Wireless RERC)
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Atlanta, GA 30318-0490

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Fax: (404) 894-1445

(Former FCC Chief of the Emergency Broadcast System and
The Emergency Alert System)

Dated this 9th day of October, 2003