



WORLD

Technology News and Commentary for Deaf and Hard of Hearing People



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ALSO INSIDE:

Locating Callers in a Wireless World
Page 20

TDI in Action
Page 26

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“TDI provides leadership in achieving equal access to telecommunications, media, and information technologies for deaf and hard of hearing people.”

FEATURE ARTICLES

Why Do We Need Text-to-911? pg 16

Text-to-911: Quick Facts & FAQs pg 18

“Locating 911 Callers in a Wireless World” pg 20

Text-To-911 Service For Hearing Impaired Introduced In B.C. FirstPg. 30

REGULAR COLUMNS

BOARD VIEWS by Dr. Roy Miller, TDI President pg 2
Memories and a Fond Farewell

CAPITOL COMMENTARY by Claude Stout, TDI Executive Director pg 4
Universal Access is A Mission for Everyone!

ACCESSIBLE TECH by James House, TDI World Editor pg 8
Dr. Weitbrecht Lives On!

TDI Affiliate Membership Form.....pg 20

TDI Membership Formpg 21

TDI IN ACTION June - November 2012pg 26

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Blackberry (C3) • CapTel (pg. C4)

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Volume 43.3&4

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Shaping An Accessible World

Board Views



BY DR. ROY MILLER
TDI President

“Suffice it to say that during my tenure the organization [TDI] has grown into the most important organization in Washington, DC advocating for the telecommunications access rights of all deaf and hard of hearing people, and I am quite proud of that achievement.”

Memories and a Fond Farewell

By the time you read this the TDI-ALDA 2013 Joint Conference will be over, and my tenure on the TDI Board of Directors will have come to an end. After twenty years, and over 9,000 volunteer hours, I decided it was time to step aside and let someone else “run the railroad.” Needless to say, my decision to leave the TDI Board was a difficult one, as over the years that I have served on the TDI Board I have developed deep emotional ties to the organization, warm personal relationships with various past and present Board members, great respect for a committed staff, and a strong philosophical commitment to the mission of the organization. But all things in life change, and it is time for new leadership to guide the organization in meeting the challenges of the future.

In this my last column for *TDI World*, I want to take a little “walk down memory lane” and highlight some of the changes that have occurred at TDI during my time on the TDI Board. I was elected to the TDI Board in 1993, became the Vice President in 1995, and have served as President since 1997. During that time there have been many infrastructure changes at TDI. Shortly after joining the TDI Board, I developed a comprehensive Employee Manual, a Board Handbook, and a Board Policies Manual. A Strategic Planning document was later developed to guide organizational activities. The mission statement was broadened to clarify that TDI advocates for all deaf and hard of hearing people. The logo was changed to reflect changing telecommunication technologies, and to eliminate the

visual image that suggested that TDI only served people who used TTYs. And a tag line was created to succinctly summarize the activities of TDI (“Shaping An Accessible World”).

The bylaws were revised, and the Board was changed from an all-elected Board to one with five elected members and four appointed at-large members. This new structure would allow the Board when needed to seek persons with particular characteristics, experiences, backgrounds, and skills necessary to ensure a diversified Board representing all deaf and hard of hearing people.

The *GA-SK Newsletter* was changed to the *TDI World* magazine to reflect the fact that TTY technology was becoming archaic, and again to eliminate the suggestion that TDI served only TTY users. A website was developed, email was used to distribute occasional “eNotes,” and TDI announcements began to be seen on Facebook and Twitter. Indeed, during my time on the Board the organization was rebranded, its governing body was restructured, its operating policies and procedures were codified, and its communication tools were updated.

Along with the many infrastructure changes came a variety of important mission changes. TDI was created in 1968 to refurbish used teletypewriters, equip them with a Weitbrecht modem to enable them to communicate over the telephone network, and then to distribute those modified TTYs to deaf clubs and individuals. Its focus for the next 25 years was on securing access to the telephone network for primarily culturally Deaf people as TTYs evolved from clunky mechanical monsters

Continued on page 3

BOARD VIEWS Continued from page 2

like the Model 15 to small electronic devices that could fit in an inside pocket of a suit coat and could be used with a cell phone (like the Compact TTY). But during the past 20 years the focus of TDI has broadened immensely to include securing access for deaf and hard of hearing people to TV programs, DVDs, movies, the Internet, smart phones, Tablets, 9-1-1 public safety answering points, and so forth. And during that time Telecommunications Relay Services were fully implemented and expanded to include voice carry over, hearing carry over, speech to speech, IP Relay, VRS, and most recently IP-CTS – each presenting its own access challenges. Technology keeps changing, and every new communications tool generally requires TDI advocacy to ensure its accessibility to deaf and hard of hearing people.

As technology kept evolving, it became harder and harder for the TDI staff to keep abreast of the many access issues considered by the Federal Communications Commission (FCC). To minimize that problem, and strengthen its filings with the FCC, TDI obtained the pro bono legal services of first one (Bingham McCutchen, LLP) then two (Institute for Public Representation of the Georgetown University Law Center), and now three (Samuelson-Glushko Technology Law and Policy Clinic of the University of Colorado Law School) legal firms. Those firms accepted the responsibility of quickly and competently drafting all comments, reply comments, and petitions to the FCC that concerned issues about which deaf and hard of hearing consumers had an interest. With the services of those legal firms, TDI changed from an organization that was able to provide only an occasional consumer-drafted comment to the FCC to one that was able to comment on each and every issue

affecting deaf and hard of hearing consumers – and those comments were knowledgeable and packed with legal arguments. As the expertise of our pro bono lawyers became apparent to other organizations, TDI developed a coordinating role sharing its drafts with representatives of other organizations including the National Association of the Deaf (NAD), Hearing Loss association of America (HLAA), the Association of Late-Deafened Adults (ALDA), the American Association of the Deaf-Blind (AADB), Cerebral Palsy and Deaf Organization (CPADO), and others, allowing them to make suggested changes in the documents, and inviting them to “sign on” to the final comments. With this process, TDI changed from a singular voice representing some Deaf consumers to the most important collective voice in Washington, DC advocating for the telecommunications rights of all deaf and hard of hearing people..

The struggle for access to telecommunications, media, and information technologies brings new challenges almost daily. And to meet those challenges TDI was fortunate to hire Claude Stout as its Executive Director back in 1997. I would be remiss if I did not indicate

what a pleasure it has been to work with a man as committed to meeting the access needs of people with hearing loss as Claude. He is a true professional, believes passionately in the evolving mission of TDI, and has certainly made life easier for me as he has fully supported my every effort to diversify the Board and expand the mission of TDI. Those efforts aimed at diversification and inclusion have also been strongly supported by various Board members that I have had the privilege of working with over many years, especially Carol Sliney and Joe Duarte who brought to the Board a strong and consistent commitment to ensuring that TDI never forgot the access needs of hard of hearing people and people with cochlear implants.

Every nonprofit organization has faced funding issues during the past two decades, but TDI managed to weather that storm in part by securing 2.8 million dollars in federal grants from the Department of Homeland Security (DHS) and the Federal Emergency Management Agency (FEMA). That money was used to develop the Community Emergency Preparedness Information Network (CEPIN) and expand our role in securing communications access for deaf and

Continued on page 7



Capitol Commentary



BY CLAUDE STOUT
TDI Executive Director

“It is not just about providing assistive technology so we can function on a level playing field with others who have no disabilities. ... We must embrace the belief that we, people with disabilities are capable of contributing substantially to the American way of life.”

Universal Access is A Mission for Everyone!

(full text of the comments which TDI Executive Director Claude Stout made on the panel during the opening ceremony of M-Enabling Summit, Washington, D.C. on June 6, 2013)

Universal Access applies to all of us at any age, whether we have a disability or not. It is a mission we all must work together to achieve, and its total fulfillment would benefit all Americans. It is also a unique approach that tears down the “can’t do” mentality. Clearly, it means no one is to be left out. George Bernard Shaw said it best: “Some men see things as they are and say why. I dream things that never were and say why not.”

It is not just about providing assistive technology so we can function on a level playing field with others who have no disabilities. It requires us to think “outside the box,” or change our way of thinking. We must embrace the belief that we, people with disabilities are capable of contributing substantially to the American way of life. We must grant the notion that anyone, with or without a disability, but with qualifications through training, skills, and experience, can perform almost any job available in the workplace. One of us can become a U.S. President, or a CEO of a major corporation.

Let us all salute three groups of stakeholders in their ongoing pursuit of the American dream. They are government policymakers, industry players, and consumer advocates. Let me mention a few examples of their exemplary work toward this noble goal.

From the halls of government, we are fortunate to have had United States Congress’ support in enacting several disability laws that assure people with disabilities and their access in telecommunications and media such as the Americans with Disabilities Act, the Telecommunications Act of 1996, and most recently the Communications and Video Accessibility Act of 2010. I do want to recognize the Federal Communications Commission in the United States, which by far is the model federal agency in providing disability access, following through with inclusive rule-making processes to develop, implement, and enforce policies and regulations for us to comply with these laws.

From the industry side, let us recognize the empowering initiatives of Sprint, AT&T, Verizon, and Google to support universal access. Sprint has hired an amazing good number of deaf and hard of hearing individuals to be on its marketing team, and over the years, the team has generated a huge following of its deaf and hard of hearing customers with its line of Sprint Relay smart phones and its special ID Pack program. With over 250,000 apps available in the Android market, it can become overwhelming. The Sprint Relay ID Pack is a collection of useful apps, wallpapers, widgets, ring tones, etc. that meet communication and information needs of individuals who are deaf or hard of hearing. AT&T convenes its two blue-ribbon advisory panels for quarterly meetings each year where

Continued on page 7

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Revised 03/18/2014

CAPITOL COMMENTARY Continued from page 4

consumer advocates can give input to AT&T officials on how to improve its products, services, and operations to meet needs of people with disabilities. AT&T seeks to do its job better by understanding our needs and issues, and meeting these needs effectively and efficiently. Verizon took the lead in the market with its early support and commitment by implementing trials in several cities across the nation for text-to-911 emergency calling. Within a year, its deaf and hard of hearing customers will be able to make direct emergency calls by texting to the most appropriate 9-1-1 center. Google has come up with an auto-captioning tool, which allows commercial video producers and do-it-yourself amateurs alike to simplify the captioning process on YouTube videos. This comes at a pivotal time when videos are being posted on the Internet at a phenomenal rate every day.

Last but not least, we cannot achieve any real progress without consumer input or action. With key pro bono legal support from Bingham-McCutchen and Institute for Public Representation under the Georgetown University Law School, TDI has collaborated with a number of other sister consumer organizations to formulate opinion and recommendations on a range of issues, such as relay services, TV

and Internet captioning, broadband access, emergency communications, and other issues to make hundreds of filings every year with the Federal Communications Commission. Even in America, it can take an action of one person to benefit the rest of us. It took a Russ Boltz to reach settlement with five movie studios to caption movies and bonus features that are on DVDs. We had a Sheri Farinha in the early 1980's who filed a discrimination complaint with United States Department of Justice, so that we can have prompt service from a local 9-1-1 center once we make an emergency call on the TTY.

While we are making significant progress, we still have ways to go. Why can't more people with disabilities be featured in advertisements in print, TV, and on the Internet? There are 57 to 75 million people with disabilities – estimates show we have a spending power of \$200 to \$500 billion. We invite you to consult with us as soon as you have plans on the drawing board for upcoming new products and services. You would be amazed to find that by making your offerings more accessible, you would be catering to a wider market, including those without disabilities. We need an active partner in you, to stand side-by-side with us, to use the power of advertising to project all the good the disability sector has to offer to the general public.

Why can't many of us with disabilities

be hired for any level of employment in government, the marketplace, and the service professions? 50 to 70 percent of us are without jobs, and participate in entitlement programs. With proper training, skills, and experience, people with disabilities can and do make great workers and executives! Mark my word. Many of us function like turtles, not hares! Offering accessible products and services, and hiring of people with disabilities makes for a meaningful one-two punch! You can call it reinventing the U.S. economy or the economy of the country you represent outside the U.S.!

Those of you who are without a disability, it is possible that you are temporarily able-bodied. As you age, you may experience having a disability. With proper foresight and action now, by then, we would already have products and services that help you stay actively included and involved in your community.

The potential for universal access is real, some of us know we are not dreaming. There is a saying, "When there is a high tide, all boats rise together." We commend those of you who have worked hard to make this happen, and those of you who haven't done it, or are starting to embrace this principle, we welcome you with an open mind, and an eagerness to collaborate with you. Together, we are seeking to build a newer world. There is no better way to say it, it is the right thing to do!

BOARD VIEWS Continued from page 3

hard of hearing people with first responders in emergency situations.

Well, I could go on and on concerning the many changes that have come to TDI during my time on the Board, but I fear that my "walk down memory lane" must come to an end. Suffice it to say that during my tenure the organization has grown into the

most important organization in Washington, DC advocating for the telecommunications access rights of all deaf and hard of hearing people, and I am quite proud of that achievement. Serving on the TDI Board has been a very important part of my life, and I deeply appreciate having been given the privilege of serving as its president for the past 16 years. I can only hope that I have contributed meaningfully

to the organization during that time. I wish TDI continued success in the future as it battles for telecommunications access for all people with hearing loss. And to the many friends that I have made while serving on the TDI Board, I thank you for your support and bid you a "Fond Farewell." It's been a wonderful twenty years!

Accessible Tech



BY JAMES HOUSE
TDI World Editor

**“To all the co-workers,
interns, and volunteers
who have come and gone,
our friends in academia,
industry, and government,
and last but not least
- the consumer
advocates among us,
I want to say ‘Thank
you!’”**

Dr. Weitbrecht Lives On!

Adapted from award acceptance speech 10/19/2013

Dr. Robert H. Weitbrecht passed away in 1983, about 30 years ago, but his memory lives on to this day. I remember receiving my first TTY Model from Bob Jones 15 when I was 15 years old from my local TDI agent in Portland, Oregon. Little did I know back then I would be honored with this award. It is a humbling experience to be with others who won this and all other TDI awards. The award captures the passion and the spirit of all recipients before me.

Someone once told me a story that illustrated Weitbrecht's low-keyed character where he is more comfortable doing the work he was supposed to do than to toot his own horn. One day, Weitbrecht went to visit a school for the deaf with a friend. As instructed, they went to a waiting room and sat for quite some time just

outside the superintendent's office. Because Bob was casually dressed with a baseball cap, the superintendent did not recognize him and passed by several times. When someone spotted Mr. Weitbrecht and informed the superintendent, all of a sudden classes were called to a screeching halt and a special assembly was hastily put together to give the students a chance to meet the inventor of the TTY. Dr. Weitbrecht was a humble man who just wanted to make a difference in the lives of deaf and hard of hearing people. This award represents the collective achievements of tireless advocates who kept moving forward to make things happen more than looking back on their individual accomplishments that TDI recognizes during its biennial conferences.

This award also brings to light a few lessons we need to learn. Twenty six years ago in 1987, I played a major role in bringing the first real time captioned local news to Washington, D.C. Now we see captioned programming on the Internet but it is not everywhere. We know the demand is out there. One lesson I learned is we need to find people that can make things happen like John Long, the



Dr. Robert H. Weitbrecht

Continued on page 10



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ACCESSIBLE TECH Continued from page 8

Vice President of Sales at WJLA who is the father of a deaf son. I proposed the captioned news concept to him and the rest is history. People who can make things happen are not always at the FCC but they are out there, and our challenge is to find those who can grease the wheels.

In the 15 years that I have worked at TDI we have amassed many more options to participate in society. Now is not the time to stop. We have seen so much more variety in relay services but now that diversity in functional equivalency is being threatened by the bean counters looking to make deep cuts without considering the struggles we face every day. We need to preserve what we have accomplished in the past, even as we move forward. That's lesson number two.

Lesson number three is that awards do not mean that the job is done. We need to continue to push for TV captioning quality standards as it will define IP captioning. Another area that will consume our time and energy is Text to 911. It is coming very soon, and we really do need to set up a public education campaign on how bring the service to the 6300 jurisdictions, and how to use this new service effectively as soon as it is rolled out - what should we text first when we make the call? Location technology may not be perfected by the time your local 911 center goes

“This Weitbrecht Award belongs to all advocates and those who have worked with me to achieve so many milestones in the last fifteen years . . . Credit goes to everyone who has worked together with me over the years.”

online. Text your location as best as you can and then explain what type of assistance you need. Current location identifying technology can only lead emergency crews to your address, but if you are in an office building, hotel, parking garage, or apartment, they can spend a lot of time searching for you unless you give them some extra help. The FCC is currently reviewing new technology that can pinpoint the location of your phone during the call (ie: in your hotel room on the 18th floor).

Our next lesson especially in this particular arena of accessible technology, is to become familiar with the issues at hand. This includes subscribing to news services and blogs that touch upon as much of the following that applies to your line of work such as: technology policy, disability rights, industry or professional trade publications, deaf hard of hearing news on local and national levels.

Last but not least is to give credit where it is due. All major

achievements today come not from individuals, but from dedicated efforts of several people who played various roles. TDI strives to work on a consensus basis where every party has a chance to iron out their differences internally, and then speak with one united voice externally. This Weitbrecht Award belongs to all advocates and those who have worked with me to achieve so many milestones in the last fifteen years...

Credit goes to everyone who has worked together with me over the years. Space does not permit me to list each name, but I do want to mention Claude Stout who has been a consistent leader and mentor on advocacy through consensus. Also kudos to Dr. Roy Miller and all current and former members of the Board whose collective wisdom guides every one of us in representing TDI inclusively. To all the co-workers, interns, and volunteers who have come and gone, our friends in academia, industry, and government, and last but not least - the consumer advocates among us, I want to say “Thank you!”

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(Revised (01/06/2011))

EMERGENCY TEXT 911

Why Do
We Need
Text-to-911?

Some of you may ask, "Why do we need Text-to-911?" Aside from the obvious benefits to TDI and the 49 million constituents who are deaf or hard of hearing that we represent, there are several compelling reasons to offer the new service in the name of enhanced public safety.

There are 330 million connected wireless devices in the United States, and our population is approximately 313 million. This means there are many of us who own more than one wireless device. According to Motorola, 70% of calls to 9-1-1 are placed by wireless callers. About one third of us have disconnected our old-fashioned telephone service

completely. Nearly all Americans live in areas where there is access to 3G and 4G services. There have been exponential increases in text messaging with more than 8 trillion texts sent in 2012, over one trillion additional messages from the year before.

During the Virginia Tech shootings

TEXT-TO-911 Continued on page 14

Text-to-911 Deployments as of January 15, 2014

State	Jurisdiction	PSAPs Accepting Texts	Carriers	Text-to-911 Platform	Deployment Date
California	Los Angeles County	CSU Long Beach Police	Verizon	TCS - Web Browser/GEM911	11/20/2013
Colorado	City of Aspen & Pitkin County	Pitkin County Emergency Dispatch (Pitkin County and Roaring Fork Valley portion of Eagle County)	Verizon	TCS - Web Browser/GEM911	10/28/2013
Iowa	Entire State	All	i-Wireless	Intrado - TXT-2-911	8/1/2009
Maine	Entire State	Gray & Orono DPS	Verizon	TCS - SMS to TTY	6/1/2013
Maryland	Frederick County	Frederick County Emergency Communications Center	Verizon	TCS - Web Browser/GEM911	3/21/2013
Montana	Misoula County	Missoula County 911 Center	Verizon	TCS - Web Browser/GEM911	10/31/2013
New York	Chemung County	Chemung County Communication Center	Verizon	TCS - Web Browser/GEM911	8/1/2013
	Monroe County & Rochester	Monroe County 911 Center	Verizon	TCS - Web Browser/GEM911	5/24/2013
	Montgomery County	Montgomery County Sheriff	Verizon	TCS - Web Browser/GEM911	7/15/2013
	Oneida County & Oriskany	Oneida County Sheriff	Verizon	TCS - Web Browser/GEM911	6/6/2013
	Onondaga County	Onondaga Police	Verizon	TCS - Web Browser/GEM911	9/27/2013
	Steuben County & Bath	Steuben County E911	Verizon	TCS - Web Browser/GEM911	3/12/2013
North Carolina	City of Durham	Durham Emergency Communications Center	Verizon	Intrado - TXT-2-911	8/1/2011
Ohio	Geauga County	Geauga County Emergency Services	Verizon	TCS - Web Browser/GEM911	8/20/2013
	Hamilton County	Hamilton County Communications Center	Verizon	Intrado - TXT-2-911	
Pennsylvania	Dauphin	Dauphin County EMA		TTY	7/15/2013
	Lancaster	Lancaster County-wide Communications	Verizon	TCS - Web Browser/GEM911	7/10/2013
	Luzerne	Luzerne County	Verizon	TTY	8/14/2013
South Carolina	Greenville County	Fountain Inn Police, Greenville County Sheriff, Greenville Police, Greer Police, Simpsonville Police, Maudlin Police, Treveler's Rest Police	Verizon	TCS - Web Browser/GEM911	10/28/2013
Texas	Collin County except cities of Plano, Garland, Richardson, and Wylie	Allen Police, Collin County Sheriff, Frisco Police, McKinney Police, Murphy Police, Prosper Police, Sachse Police Emergency Communications Center	Verizon	TCS - Web Browser/GEM911	7/18/2013
	Erath County	Erath County Sheriff	Verizon	TCS - Web Browser/GEM911	9/24/2013
	Hood County	Hood County Sheriff	Verizon	TCS - Web Browser/GEM911	9/24/2013
	McLennan County	Woodway Public Safety Dept.	Verizon	TTY	7/22/2013
	Parker County	Parker County Sheriff Weatherford Police	Verizon	TCS - Web Browser/GEM911	9/24/2013
	Somervell County	Somervell County Sheriff	Verizon	TCS - Web Browser/GEM911	9/24/2013
	Wise County, Decatur, Bridgeport	Wise County Sheriff, Bridgeport Police, Decatur Police	Verizon	TCS - Web Browser/GEM911	1/17/2013
Vermont	Entire State	Vermont State Police - Williston (for entire state)	Verizon	Intrado - TXT-2-911	4/16/2012
			AT&T	Unknown	6 month trial Aug. 2013 - Feb. 2014
Virginia	James City	James City County	Verizon	TCS - Web Browser/GEM911	9/19/2013
	Southampton	Southampton County Sheriff	Verizon	TCS - Web Browser/GEM911	10/1/2013
	Yorktown	York-Poquoson-Williamsburg 911 Center	Verizon	TCS - Web Browser/GEM911	12/10/2012

TEXT-TO-911 Continued from page 12

in the spring of 2007, we learned too late that victims and passers by resorted to text messaging where their pleas went nowhere, and many kept on waiting amid the confusion for help that never came until someone actually called the responders. In a more recent poll, 52% believed it would be possible to send a text to 9-1-1 if they had an emergency.

In announcing plans for Text-to-911 service, Julius Genachowski, former Chair of the Federal Communications Commission (FCC) said, "It's hard to imagine that airlines can send text messages if your flight is delayed, but you can't send a text message to 9-1-1 in an emergency. The unfortunate truth is that the capability of our emergency response communications has not kept pace with commercial innovation has not kept pace with what ordinary people now do every day with communications devices."

Spurred by a mandate from the Communications and Video Accessibility Act (CVAA) and increasing pressure from consumers everywhere, the Emergency Access Advisory Committee (EAAC) recommended that the FCC implement a way for people to send texts to their local 911 services. This would be an interim step in the nation's effort to upgrade to the next generation of 9-1-1 services, or NG-911.

In December of 2012, National Emergency Number Association, (NENA), Association of Public Communication Officials (APCO), and the four major cellular carriers (AT&T, Sprint, T-Mobile, and Verizon) signed an agreement to support Text-to-911 by May 15, 2014. For now, the ability to contact 911 is limited to a few areas as shown in a chart elsewhere in this issue.

The EAAC has recommended a true nationally focused SMS Interim Text to 911 service. This will provide a way



for 911 centers to receive text messages from people who once used TTYs but have abandoned this old technology in favor of the ubiquitous system. Most mobile phones have texting capabilities.

One important milestone was implemented last year - Bounce-Back Messages. As of September 30, 2013, all wireless telephone companies and certain other text messaging providers are required to send an automatic "bounce-back" message to any consumer who attempts to send a text message to 911 where this service is not yet available. Consumers who receive this "bounce-back" message will be advised to contact emergency services by another means, such as by making a voice call or using a telecommunications relay service (the latter for consumers who are deaf, hard of hearing or have a speech disability).

When will Text-to-911 become widely available?

The voluntary agreement by AT&T, Sprint, T-Mobile, and Verizon to provide Text-to-911 service by May 15, 2014 in all areas served by their networks only where a 911 call center is prepared to receive texts. The FCC has also proposed rules for public comment requiring all other wireless telephone companies and certain providers of text messaging applications to likewise provide text-to-911 by May 15, 2014 in

all areas where a 911 call center is prepared to receive the texts. Therefore, text-to-911 deployment will happen gradually, depending in part on when local 911 call centers prepare their systems to receive texts. The U.S. Department of Justice (DOJ) has already gone on record asserting that PSAPs who are already equipped to receive TTY calls can pursue minor upgrades to receive incoming text calls.

TDI and other consumer groups responded that the FCC should require all other carriers in addition to the major carriers – including rural areas and private call centers (large employers, universities, shopping malls, etc.) to support bounceback error messages. Further more, the consumer groups ask that the FCC and DOJ require all public safety answering points (PSAPs) and other 911 call centers to support incoming text messages as soon as possible. Consumers everywhere should talk to their local emergency management officials and ask for quick implementation of Text-to-911 if there are no trials currently going on in their areas.

The consumer groups offer the following recommendations on how to contact 9-1-1:

IMPORTANT! If you use a wireless



LIMITING THE TIME A PATIENT WAITS. *NO MATTER THE ROOM.*

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TEXT-TO-911 Continued from page 15

phone or other type of mobile device, make sure to do the following in an emergency:

- Always know your location.
- Call 911 if you can speak, text 911 if you cannot.
- If you are deaf, hard of hearing or have a speech disability, use a TTY or a relay service, if possible.
- Or you can just simply dial 9-1-1, but do not hang up.

Information on how and where to use text to 911 will become more widespread as additional counties and states implement the service.

Initially, when you call or text 911 from a wireless device, you should give your location and your phone number first.

Current location identification technology will give your building street address, but may not pinpoint your exact location (which floor, room,



office number, apartment unit, parking garage level, etc.) See sidebar about more recent developments in location identifying technology.

The interim texting solution will not have the same level of connectivity and service as NG-911 will offer. The interim solution will only deliver basic SMS, no other forms of text messaging such as Multimedia Service (MMS) Instant Message Service (IMS), Real-Time Text (RTT), and other emerging forms of texting.

Most of the jurisdictions that have already implemented Text-to-911 trials involve a single vendor doing the

testing with a partner. Some PSAPs can upgrade their existing TTY software to work with text messages (Text to TTY). All PSAPs can automatically capture content of each call using the ATIS/TIA Text Control Center (TCC) standard. PSAPs that use the newer protocols will be able to offer the full potential of Internet texting as soon as the NG-911 is available.

What is Next?

- Text-to-911 is only the beginning.
- Location identifying technology will improve and become more precise.
- In next 5-10 years, expect more services to roll out as NG-911 is developed.
- When NG-911 is fully deployed you will be able to contact 9-1-1 directly via voice, text, video, or data.
- PSAPs will be able to pull in interpreters to work with your specific communication needs.

**YOU'RE LOOKING
AT THE ONLY VRS AD
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Text-to-911

Quick Facts & FAQs

EDITOR'S NOTE: ASL version available at the FCC's official web page on Text-to-911. Go to: <http://www.fcc.gov/text-to-911>

Text-to-911 is the ability to send a text message to reach 911 emergency call takers from your mobile phone or device.

In the future, text-to-911 may be widely available in the United States. However, for now, the ability to contact 911 using text is only available on a limited basis in a few markets. For this reason, you should not rely on text to reach 911.

How to Contact 911

IMPORTANT! If you use a wireless phone or other type of mobile device, make sure to do the following in an emergency:

Always contact 911 by making a voice call, if you can.

If you are deaf, hard of hearing or have a speech disability, use a TTY or a telecommunications relay service, if possible.

Remember - in most cases now, you cannot reach 911 by sending a text message.

Bounce-Back Messages

The FCC has rules to help keep consumers safe during the transition to text-to-911. These rules are intended to minimize the risk if consumers attempt to send text messages to 911 where the service is not available. Specifically, beginning September 30, 2013, all wireless telephone companies and certain other text messaging providers are required by the FCC to send an automatic "bounce-back" message to any consumer who tries to send a text message to 911 where this service is not yet available.

Today most consumers cannot reach

911 by sending a text message from their wireless phone.

In limited areas of the United States, however, it is now possible to use certain wireless telephone services to send a text message to 911. This means that in such areas, if you are unable to make a voice 911 call, you can type your message on your wireless phone and send it to a 911 operator. **But even where text-to-911 is available, if you are able to make a voice call to 911, and if it is safe to do so, you should always make a voice call to 911 instead.**

The four largest wireless telephone companies (AT&T, Sprint, T-Mobile, and Verizon) have voluntarily committed to make texting to 911 available by May 15, 2014 in areas where the local 911 center is prepared to receive the texts.

By September 30, 2013, if you attempt to send a text to 911 where text-to-911 service is unavailable, you will receive an immediate "bounce-back" message that text-to-911 is not available and that you should contact emergency services by another means, such as by making a voice call or using telecommunications relay services (the latter for consumers who are deaf, hard of hearing, or have a speech disability).

Consumers who receive this "bounce-back" message will be advised to contact emergency services by another means, such as by making a voice call or using a telecommunications relay service (the latter for consumers who are deaf, hard of hearing or have a speech disability).

The nation's four largest wireless telephone companies - AT&T, Sprint, T-Mobile, and Verizon - have agreed

to voluntarily begin sending these "bounce back" text messages across their networks as of June 30, 2013, a few months earlier than the September 2013 deadline established by the FCC's rules.

For more information and/or updates regarding text-to-911, please visit <http://www.fcc.gov/text-to-911>. For links to FCC proceedings about text-to-911, please visit: <http://www.fcc.gov/document/text-911-bounce-back-message-order>, and <http://www.fcc.gov/document/text-911-further-notice-proposed-rulemaking>.

Frequently Asked Questions

What is text-to-911 and why would I want to use it?

It is the ability to send a "short message" (SMS) or other kind of text message to 911. Texting during an emergency could be helpful if you are deaf, hard of hearing, or have a speech disability, or if a voice call to 911 might otherwise be dangerous or impossible. But if you are able to make a voice call to 911, and if it is safe to do so, you should always make a voice call to 911.

How can I find out if my area has text-to-911 capability?

Ask your wireless phone company if text-to-911 is available in your area. You can also ask your state legislators or public safety officials if your local 911 center is prepared to accept text-to-911 messages. Public information lines, such as 211 or 311, also may have more information on text-to-911 service availability in your area. (Also, see information on specific areas where Text-to-911 is available.)

FACTS AND FAQs Continued on page 18

FACTS AND FAQS Continued from page 17

If text-to-911 is available in my area, what type of wireless phone or service do I need to send an emergency text?

Check with your wireless phone company. In general, you must have a text-capable wireless phone and a wireless service subscription or contract with a wireless phone company. You may also need a "wireless data plan." Remember, you can make a voice call to 911 using a wireless phone that does not have a service plan, but you cannot send a

text message to 911 without a service contract that includes texting.

Why isn't text-to-911 available everywhere in the country?

Text-to-911 is a new capability that may require upgrades to local 911 centers and coordination among wireless phone companies, equipment vendors and manufacturers, and state and local public safety agencies. It is likely to become more widely available over time as wireless phone companies provide text-to-911 capability and 911 centers modernize their systems to accept text messages.

If I am able to text-to-911, will the 911 center automatically know my location?

Texting to 911 is different from making a voice call to 911 in this respect. When you make a voice call to 911, the call taker will typically receive your phone number and your approximate location automatically. This is called "Enhanced 911" or "E911." However, in most cases when you text 911 from a wireless phone, the call taker will not receive this automated information. For this reason, if you send a text message to 911, it is important to give the 911 call taker an accurate address or location as quickly as possible, if you can.

If text-to-911 is available to me, why should I use it only when a voice call to 911 is not an option?

Voice calls to 911 are usually the most efficient way to reach emergency help. For example, voice calls allow the 911 operator to more quickly ask questions and obtain information from the

caller, while two-way communication by text can take more time and is subject to limits on the length of text messages. In addition, when you make a voice call to 911, the call taker will typically receive your phone number and the approximate location of your phone automatically.

What are the FCC's rules on 911?

The FCC's 911 rules require the following:

- Wireless phone companies must transmit all 911 voice calls to 911 centers (also known as Public Safety Answering Points, or PSAPs).
- Wireless phone companies must send information about your telephone number and location to a PSAP when you make a 911 call so you can get help more easily.
- Wireless phone companies, as well as certain text messaging applications, must provide, no later than September 30, 2013, automated "bounce-back" messages in instances when you attempt to send a text message to 911 in an area where text-to-911 service is unavailable. The bounce-back messages will inform you that text-to-911 is not available and direct you to contact emergency services by another means, such as by making a voice call or using telecommunications relay services (if you are deaf, hard of hearing, or have a speech disability).

The FCC does not currently require any companies to transmit text messages to 911 centers. However, the FCC currently is seeking public comment on proposed rules that would require wireless phone companies and certain other text message providers to begin transmitting text messages to 911 in the future.

The FCC does not have authority to issue rules regulating 911 centers, and so it cannot require these centers to accept text messages.

More About Text-to-911

To learn more about FCC programs to promote access to telecommunications services for people with disabilities, visit the FCC's Disability Rights Office website.

For information about other telecommunications issues, visit the FCC's Consumer website, or contact the FCC's Consumer Center by calling

1-888-CALL-FCC (1-888-225-5322) voice or
1-888-TELL-FCC (1-888-835-5322) TTY;
Faxing 1-866-418-0232;

Or writing to:

Federal Communications Commission
Consumer and Governmental Affairs Bureau
Consumer Inquiries and Complaints Division
445 12th Street, SW
Washington, DC 20554

Updated: October 29, 2013

FACTS AND FAQS Continued on page 27

Locating 9-1-1 Callers in a Wireless World

EDITOR'S NOTE: This article was adapted from a testimony that Claude L. Stout, Executive Director of TDI, delivered during a hearing of the U.S. Senate Subcommittee on Communications, Technology, and the Internet, under the Committee on Commerce, Science, and Transportation, on January 16, 2014.

Over the past decade there have been tremendous changes in the way Americans use technology to communicate with and obtain access to emergency services. Deaf and hard of hearing Americans are benefiting from this transition also. We no longer rely on legacy TTYs and have moved on with everyone else to using broadband technologies for our communications needs.

Today we use smart phones, tablets, videophones, captioned telephones or desktop computers. We make and receive calls like the rest of you through several different channels. We can have direct or "peer-to-peer" communication with others that use the same devices we are using, for example – we use videophones to converse with each other in sign language.

If we want to call someone that doesn't know how to sign, or does not use the same devices, we are able to call them indirectly by using a Video Relay Service. There are other different ways deaf and hard of hearing people can contact their family or friends and conduct business affairs, such as through Captioned Telephone Relay Services, or Internet Protocol (IP)

Relay Service.

Many years ago, when deaf and hard of hearing people had to make an emergency call on the TeleType or "TTY," we had to dial 9-1-1 on a regular phone and then put the handset on an acoustic coupler in order to transmit and receive tones between the phone and the TTY. If we lose consciousness or just simply don't have the time or the ability to continue the phone call, we would just drop the handset, and leave it off the hook. Most 9-1-1 centers will still get location details from the Automatic Number Identifier (ANI) and Automatic Location Identifier (ALI) features within the e911 system to detect the originating telephone number and the physical address linked to that number. In the absence of any further verbal (or textual) information, the dispatcher would still verify the call by sending at least a police officer to the site of the incident.

There seems to be a consensus today that despite these advances, there remain challenges with accurate location details when using a wireless phone indoors in an emergency. The Federal Communications Commission (FCC) exempted indoor locations from its wireless location accuracy rules in 2010 pending further studies and the availability



Claude L. Stout, Executive Director of TDI, gives testimony on January 16, 2014, during a hearing of the U.S. Senate Subcommittee on Communications, Technology, and the Internet, under the Committee on Commerce, Science, and Transportation.

of more accurate and reliable indoor location technologies. Current Global Positioning Systems (GPS) and other triangulation systems available on most wireless devices today (ie: pagers, phones or tablets) often do not work reliably indoors, and other triangulation "fall-back" systems provide only generalized location information which may cover several city blocks. Particularly if we live or work in multi-story buildings, the responders frequently cannot identify the exact building address, and most certainly not the apartment unit or office suite. This is a problematic issue that needs to be addressed.

One of the core missions of FCC's Communications Security, Reliability and Interoperability Council's (CSRIC) is to provide recommendations to ensure optimal security and reliability of communications systems used in telecommunications, media, and public safety. The consumer groups understand from reviewing test results published last year by CSRIC, there are companies working hard to improve location identifying technologies

Continued on page 20

1. <http://www.fcc.gov/guides/telecommunications-relay-service-trs>
2. <http://www.911.gov/911-issues/serving.htm>
3. <http://www.911dispatch.com/911/911glossary.html>
4. <http://findme911.org/resources/providers-support-moving-forward/>
5. <http://www.fcc.gov/document/amending-definition-interconnected-voip-service-section-93-commissions-rules-wireless-e911->

Continued from page 19

that can not only can determine your location, generally within 50 meters on an horizontal plane, known in the industry as the X-Y coordinates, but can also reliably pinpoint the vertical "Z" coordinates as well within three meters. This helps emergency responders to go directly to the floor and to the room inside the building where the 9-1-1 call originated. When this location information is included with a 9-1-1 call or text, callers and dispatchers can concentrate on the details of the emergency itself and not lose time on trying to describe the location. This would be a huge plus for anyone not familiar with their surroundings such as children, senior citizens, or people just travelling through who are unfamiliar with the territory.

Once the connection is made to the public safety answering point, the location information needs to be immediately and automatically transmitted. This would allow the caller and the dispatcher to give primary focus to the details of the emergency. In the event that the caller was physically unable to provide further information due to deteriorating medical condition such as a heart attack or stroke, deafness or speech disability, or extenuating circumstances where it becomes unsafe to speak such as during a kidnapping or an escalating domestic violence scenario, since the location is already known to the responders, help will be forthcoming much quicker. Even if a heart attack victim was able to initiate a verbal or textual 9-1-1 call on his wireless device, the victim may lose consciousness and become unable to sustain a prolonged conversation with the 9-1-1 dispatcher.

People with visual, speech, cognitive, or mobility disabilities will not have to worry about consuming additional

minutes trying to identify their location as technology will provide that data for them immediately. Those that do not have any disabilities will benefit from these new technologies as well.

Like the ANI and ALI features of legacy e911 services, we need the same capabilities to call for help, and then let the location identifying meta-data be instantly transmitted to emergency responders for prompt and timely assistance. Although today's communication networks have become more robust in the last several years, it's reliability still has not yet achieved the same parity with legacy networks. Various systems are still vulnerable to disruptions from natural phenomena and man-made incidents, and any call could be disconnected without any advance warning.

By transmitting key location data at the beginning of each call, the 9-1-1 system would serve as a region-wide "Life Alert" system that would notify the PSAP an emergency has occurred, and to please send help. Senior citizens living alone have relied on such alerting mechanisms, but for us, we are unable to subscribe to these services, usually because it involves a voice telephone call from the "Life Alert" service personnel verifying our emergency prior to notifying the local public safety agencies.

I strongly applaud the FCC, APCO, NENA and the four major wireless carriers, AT&T, Sprint, T-Mobile USA, and Verizon for listening to consumer demands and collaboratively implementing text to 9-1-1 and other efforts as part of the Next Generation 9-1-1 (NG-911) efforts. I believe firmly this will be more powerful and useful if precise location information including data on indoor location and floor level where the call originated were included with every voice or text call.

Therefore, my first request is that

location technologies deployed to assist emergency wireless calling have a fast enough Time-To-First-Fix, or "TTFF" for the precise location information to be included in the initial voice call or text message sent to the 9-1-1 dispatcher.

My second request is for stricter indoor location accuracy requirements. Current FCC location requirements for outdoor calling requires accuracy of within 50 meters 67% of the time and within 150 meters 90% of the time. This may be adequate to locate a caller outdoors or even indoors in a rural or less dense environment. However, we understand that accuracy requirements less demanding than 50 meters in an urban environment can only provide general location information and may be inadequate to identify the exact building location. In the interest of utmost public safety, this request for accuracy of 50 meters or less needs to be given a very high priority.

My third and final request is to have floor level vertical accuracy location information included with emergency calls or texts, particularly in areas with dense urban and multi-story buildings. Although this attribute may not be as important in rural settings or outdoors, it is critically vital in large multi-story housing and office complexes. We understand the high value that emergency responders place on floor level accuracy as well. It is no less important to the deaf and hard of hearing community and for people with other disabilities.

Like our family members and friends who can hear, we do pay federal and local property taxes taxes that support our public safety services, and also pay subscriber fees to access the telephone networks as a conduit to emergency services. As 9-1-1 centers continue to rely on funding from these sources, so should we rely on them to be fully accessible to every single one of us in the community.

6. <http://www.lifealert.net/home/home.html>

7. <http://www.fcc.gov/document/chairman-genachowski-announces-commitments-accelerate-text-911>

8. <http://transition.fcc.gov/pshs/services/911-services/nextgen.html>

9. <http://www.fcc.gov/document/fcc-strengthens-e911-location-accuracy-wireless-services>



TDI In Action

June 2012 - November 2012

Editor's Note: Frequent references to other consumer groups denotes involvement and support from other leading national organizations serving deaf and hard of hearing people. This may include some or all of the following: Alexander Graham Bell Association (AGBell), American Association of the Deaf Blind (AADB), American Society for Deaf Children (ASDC), American Speech, Language, and Hearing Association (ASHA), Association of Late-Deafened Adults (ALDA), California Coalition of Agencies Serving the Deaf and Hard of Hearing (CCASDHH), Cerebral Palsy and Deaf Organization (CPADO), Communication Services for the Deaf (CSD), Deaf and Hard of Hearing Consumer Action Network (DHHCAN), Deaf Seniors of America (DSA), Hands & Voices (HV), Hearing Loss Association of America (HLAA), National Association of the Deaf (NAD), National Black Deaf Advocates (NBDA), and Registry of Interpreters for the Deaf (RID). On certain CVAA matters, sometimes we work in collaboration with other cross-disability groups and those groups that serve people who are blind or have low-vision such as the American Foundation for the Blind (AFB). Our academic partners include the Rehabilitation Engineering Research Center (RERC) on Telecommunications Access, which comprises the Technology Access Program at Gallaudet University (TAP), and the TRACE Research Center at University of Wisconsin in Madison (TRACE).

Telecommunications Relay Services:

TDI drafted a letter to the Commissioners urging them to take action on the Notice of Proposed Rulemaking regarding speech-to-speech relay ("STS") in a proceeding that had been pending for nearly four years.

On June 13, Stout sent an email to Mr. Ronald Lanier and Mr. Clayton Bowen with Virginia Department for the Deaf and Hard of Hearing for having its Virginia Relay program sponsor a limited trial for video assisted Speech-to-Speech relay services (Vid-STs).

On June 19, TDI and other consumer groups sent a letter to the FCC Chairman and four other Commissioners urging them to take action on the NPRM on speech-to-speech relay ("STS"), which has been pending for nearly four years. <http://apps.fcc.gov/ecfs/document/view?id=7021923708>

On August 9, Claude Stout and Andrew Phillips of NAD met with officials at Experian in downtown D.C. to discuss and review options they propose to offer the FCC for a self-verification system to reduce fraud, waste, and abuse with IP Relay and VRS services.

On August 23, NAD, TDI, and HLAA met with officials from Office of Strategic Policy, the Wireline Competition Bureau, Office of Chief Technology Officer, and Consumer & Governmental Affairs

Bureau to discuss a possible third party registration system for IP Relay and possibly other forms of Telecommunication Relay Service (TRS). <http://apps.fcc.gov/ecfs/document/view?id=7022007656>

On October 18, Stout took part in a meeting at NAD, on request from Purple Communications' Kelby Brick, Chair of the Interstate TRS Advisory Council, to go over some issues related to IP-CTS such as the perception of a steep increase in its usage.

On October 22, Stout sent an email to two key FCC officials on several items such as commending on hiring Suzy Rosen Singleton as Attorney Advisor in the Disability Rights Office, and to encourage them to expedite the process to certify Miracom to provide its InnoCaption captioned mobile telephone relay service.

On October 29, Stout sent an email to all five FCC Commissioners and their legal advisors citing that the real reason for the steep increase in captioned telephone relay services is that more and more of us are using some form of TRS, pointing out that TRS is a civil right for all Americans. The size of the Interstate TRS Fund is not to become an issue, as long as the integrity of the Fund is effectively maintained.

On November 26, TDI, HLAA, and ALDA met with Lyle Elder, Legal Advisor, Office of FCC Chairman Julius Genachowski, on the need for and value of captioned telephone services. <http://apps.fcc.gov/ecfs/document/view?id=7022069801>

VRS Reform:

Throughout the last five months, there were a number of meetings between officials at the FCC on the eighth floor, the staff of the Consumer and Governmental Affairs Bureau, and representatives of consumer groups, including TDI, NAD, ALDA, and DHHCAN. The latest we get from the FCC is that they are no longer pursuing the idea of implementing a per-user method to reimburse VRS providers. For now, we go back to using the per-minute method, but they are exploring options to reduce the per-minute rate, as well as to ensure the devices and services we use in VRS and video peer-to-peer communication are fully interoperable. The FCC just released a Public Notice on October 15 inviting us to send comments due November 14, and reply comments on November 29.

At time of this report, TDI and other consumer groups have agreed on a set of general principles that would guide us in our upcoming comments to the FCC. Some of the questions in the Public Notice require technical information, which we defer to Rehabilitation Engineering Research Center on Telecommunications Access (Dr. Christian Vogler) to address in their comments.

We are pleased that the FCC shares the goal of interoperability and portability of VRS services and equipment. However, to meet this goal, we will be recommending that the FCC contracts

Continued on page 22



TDI In Action

June 2012 - November 2012

Continued from page 21

with an independent third party to certify that each specific VRS service is interoperable. We will oppose a single VRS application and recommend instead a VRS reference platform that will serve as a basis for multiple VRS applications. The benefits of having a reference platform include:

Provide interoperability with mass market solutions.

Allow customization of services to meet needs of population or particular segments of the population.

Encourage more innovation because VRS providers will continue to compete on the features of their particular applications.

Private providers are more likely to innovate than a government entity or government contractor that develops a single VRS application.

We will ask that any new structure alleviates the interoperability problems, which are currently the result of a combination of issues with applications/equipment and VRS provider gateways/proxies. We agree that adopting a single application would not address interoperability issues that arise from gateway/proxy problems.

On July 2, TDI, TAP and other consumer groups met with officials of Office of General Counsel, Office of Strategic Policy, Office of Chief Technology Officer, and Consumer and Governmental Affairs Bureau, FCC on several issues related to VRS reforms. <http://apps.fcc.gov/ecfs/document/view?id=7021982246>

On October 15, TDI and NAD met with officials from the Office of Strategic Planning and Consumer and Governmental Affairs Bureau to discuss the about to be released VRS Reform Public Notice. [http://apps.fcc.gov/ecfs/document/](http://apps.fcc.gov/ecfs/document/view?id=7022036491)

[view?id=7022036491](http://apps.fcc.gov/ecfs/document/view?id=7022036491)

On October 17, TDI and NAD filed an exparte on the meeting they had with officials of the Offices of Strategic Planning and Policy Analysis, and Technology, and the Wireline Competition, and Consumer and Governmental Affairs Bureaus, FCC to discuss issues related to the FCC's previous VRS NPRM of December 15, 2011. <http://apps.fcc.gov/ecfs/document/view?id=7022036494>

On October 18, Stout took part in a meeting at NAD, on request from Purple Communications' Kelby Brick, Chair of the Interstate TRS Advisory Council, to go over some issues related to some issues with the FCC's October 15, Public Notice on VRS Reform.

On October 22, Stout sent an email to two key FCC officials thanking them for the meeting the consumer groups had with them on the October 15 Public Notice on VRS Reform and other items.

On November 7, following the monthly DHHCAN meeting at Gallaudet, Stout participated in the meeting between consumer groups and VRS industry representatives on VRS reform issues.

On November 14, TDI and other consumer groups filed comments in response to the FCC's public notice seeking additional comments on structure and practices of the Video Relay Service (VRS) program and on proposed VRS compensation rates. <http://apps.fcc.gov/ecfs/document/view?id=7022053555>

This was followed by an eNote on November 20, to inform of TDI's and other consumer groups' responses to FCC's NPRM on VRS Reform.

After reviewing feedback from consumers and other commenters, on November 29, TDI and other consumer groups filed reply comments

in response to the FCC's public notice seeking additional comments on structure and practices of the Video Relay Service (VRS) program and on proposed VRS compensation rates. <http://apps.fcc.gov/ecfs/document/view?id=7022069247>

AT&T FaceTime and TAP:

During the summer of 2012, NAD invited TDI and other consumer groups twice to meet with AT&T over concerns in the provision of new data-only TAP cell phone plans and allowing deaf/HOH users to utilize Apple's FaceTime software over AT&T's wireless network

National Deaf-Blind Equipment Distribution Program (NDBEDP):

The Federal Communications Commission (FCC) has begun to operate the NDBEDP. The FCC has allocated funds to one certified entity in each of the 50 states, plus the District of Columbia, Puerto Rico, and the U.S. Virgin Islands, to distribute equipment to individuals who are legally deaf-blind. The Perkins School for the Blind has been designated to handle outreach activities for NDBEDP.

Advanced Communication Services:

The FCC has extended requirements in design and development, record keeping, and enforcement on manufacturers and service providers to ensure that their advanced communications services and equipment are accessible to people with disabilities. Advanced communication services (ACS)

Continued on page 23



TDI In Action

June 2012 - November 2012

Continued from page 22

cover video conferencing services, non-interconnected VoIP services, electronic messaging services, and interoperable video conferencing services.

For ACS, we opposed long-term waiver requests by the Electronic Software Association (ESA), Consumer Electronics Association (CEA), and National Cable and Telecommunications Association (NCTA). These three trade groups filed petitions for waivers for multi-purpose equipment or services that they claim are designed primarily for purposes other than advanced communications services. More details in the links below for each letter.

ESA sought a waiver for three classes of products and services for a period of at least eight years: (1) game consoles, both home and handheld, and their peripherals and integrated online networks; (2) game distribution and online game play services; and (3) game software. TDI and other consumer groups made it clear that eight years would be too long to wait for such games to become accessible to persons who are deaf and hard of hearing. The FCC gave ESA only two years for their waiver.

CEA requested a waiver for Internet protocol-enabled television sets (IP-TVs) and Internet protocol-enabled digital video players (IP-DVPs) that allow consumers to access and use advanced communications services and are first manufactured prior to July 1, 2016. TDI and other consumer groups argued that the request for a three-year waiver would be too long before IP-TVs and digital video players (IP-DVPs) would be accessible for those who are deaf and hard of hearing. The FCC settled on two years, too for CEA. <http://apps.fcc.gov/ecfs/document/view?id=7021922030>

NCTA sought a waiver for set-top boxes leased by cable operators to their customers and manufactured before July 1, 2016, that are capable of accessing services or features that may qualify as advanced communications services. On July 23, TDI and other consumer groups contended that three years would be too long before such set-top boxes would be accessible for those who are deaf and hard of hearing. The set-top boxes eventually will go beyond watching television programs. Additional services will eventually be offered to us such as phone, cable modem service, and video games. The FCC allowed NCTA two years for the waiver. <http://apps.fcc.gov/ecfs/document/view?id=7021992036>

On June 14, TDI and other consumer groups met with FCC Commissioner Jessica Rosenworcel and her legal advisor, Priscilla Argeris to discuss accessible communications. <http://apps.fcc.gov/ecfs/document/view?id=7021922940>

On June 22, TDI and other consumer groups met with FCC Commissioner Ajit Pai and his legal advisor, Nicholas Degani to discuss accessible communications. <http://apps.fcc.gov/ecfs/document/view?id=7021973328>

On August 13, TDI and other groups met with officials of Consumer and Governmental Affairs Bureau, FCC to discuss pending petitions for waivers from advanced communication services ("ACS") requirements from CEA, ESA, and NCTA. <http://apps.fcc.gov/ecfs/document/view?id=7022004153>

On August 16, TDI and NAD met with Matthew Berry of FCC Commissioner Pai's office, and Dave Grimaldi of Commissioner Clyburn's office to discuss our opposition to pending petitions for waivers from the Commission's advanced

communication services requirements filed by CEA, ESA, and NCTA.

<http://apps.fcc.gov/ecfs/document/view?id=7022004680>

On August 20, TDI, Gallaudet TAP, and NAD met with Lyle Elder of FCC Chairman Genachowski's office, and Priscilla Argeris of Commissioner Rosenworcel's office to discuss our opposition to pending petitions for waivers from the Commission's advanced communication services requirements filed by CEA, ESA, and NCTA. We also reiterated our opposition to the pending petitions for exemption from the Commission's IP closed captioning rules by some members of Digital Media Association (DiMA). <http://apps.fcc.gov/ecfs/document/view?id=7022005344>

On August 28, the RERC on Telecommunications Access, NAD, and TDI sent a supplement to their previous oppositions to the pending petitions for waivers from advanced communication services requirements from CEA, ESA, and NCTA. <http://apps.fcc.gov/ecfs/document/view?id=7022008367>

On October 9, NAD, TDI, TAP met with officials of the Office of General Counsel and Consumer and Governmental Affairs Bureau to discuss ESA's ACS petition for waiver. <http://apps.fcc.gov/ecfs/document/view?id=7022031747>

Then on October 15, the FCC granted limited ACS waivers of two years each to ESA, CEA, and NCTA. http://transition.fcc.gov/Daily_Releases/Daily_Business/2012/db1015/DA-12-1645A1.pdf

IP-Captioning:

New rules were issued by the FCC for owners, producers, and distributors

Continued on page 24



TDI In Action

June 2012 - November 2012

Continued from page 23

to provide closed captioning of their video programs that are delivered online after they were aired on television (commonly referred to as IP-captioning). The rules established an implementation schedule that started September 30, 2012, for full-length prerecorded television programming that a distributor shows for the first time on the Internet. Next March, the requirements will be extended to live and near-live programming. In September 2013, programming that is edited for Internet distribution must be captioned. Then for archival video programming that is already in a distributor's Internet inventory, the distributor must add captions within 45 days after the video programming is shown on TV with captions on or after March 30, 2014. The grace period for captioning archival programming is reduced to 30 days in 2015, and then to 15 days beginning in 2016 and onward.

In conjunction with Gallaudet TAP and IPR, our pro-bono attorneys, TDI began testing and launched a survey of compliance by major video providers with the FCC's newly enacted IP captioning rules.

We also successfully defeated, in part, an effort by the Digital Media Association to delay the FCC's rules until 2014.

On June 4, TDI and other consumer groups sign on with NAD in its joint comments with the FCC on the second VPAAC report regarding user interfaces, video programming guides, and menus in the matter of Closed Captioning of Internet Protocol-Delivered Video Programming: Implementation of the 21st Century Communications and Video Accessibility Act of 2010. <http://apps.fcc.gov/ecfs/document/view?id=7021922082>

Also on June 4, TDI and other consumer groups met with officials of Media, and Consumer and Governmental Affairs Bureaus, FCC on the petitions for reconsideration filed by the Consumer Groups and the Digital Media Association (DiMA). <http://apps.fcc.gov/ecfs/document/view?id=7021921533>

On June 14, TDI and other consumer groups met with FCC Commissioner Jessica Rosenworcel and her legal advisor, Priscilla Argeris to discuss accessible video programming. <http://apps.fcc.gov/ecfs/document/view?id=7021922940>

Then on June 15, TDI, other consumer groups, and Gallaudet TAP jointly filed its comments with FCC in opposition to the petitions for temporary partial exemption or limited waiver by Digital Media Association (DiMA). <http://apps.fcc.gov/ecfs/document/view?id=7021923205>

On June 18, joint reply comments from TDI and other consumer groups, as well as TAP were filed with FCC regarding the oppositions from the Association of Public Television Stations and Public Broadcasting Service, the National Association of Broadcasters, and the National Cable and Telecommunications Association to the Consumer Groups' Petition for Reconsideration regarding "video clips." <http://apps.fcc.gov/ecfs/document/view?id=7021923411>

On the same day, joint reply comments were also filed with FCC to the oppositions of Mitsubishi Electric Visual Solutions America and the Consumer Electronics Association to the Consumer Groups' Petition for Reconsideration regarding apparatus synchronization. <http://apps.fcc.gov/ecfs/document/view?id=7021923413>

On the next day, TDI and other consumer groups signed on to

NAD's joint reply to the comments in response to the FCC's Public Notice on the second VPAAC Report on user interfaces, and video programming guides and menus. <http://apps.fcc.gov/ecfs/document/view?id=7021923721>

On June 22, TDI and other consumer groups met with FCC Commissioner Ajit Pai and his legal advisor, Nicholas Degani to discuss accessible video programming. <http://apps.fcc.gov/ecfs/document/view?id=7021973328>

TDI and other groups signed on to an exparte letter by NAD on July 11 that illustrates the importance of CEA-708 captions to video programming distributors (VPDs).

<http://apps.fcc.gov/ecfs/document/view?id=7021985827>

On July 20, TDI, TAP and other consumer groups signed on to another exparte by NAD to demonstrate the need to subject apparatus manufacturers to timing or synchronization obligations under Section 203 of the Twenty-First Century Communications and Accessibility Act of 2010 (CVAA). <http://apps.fcc.gov/ecfs/document/view?id=7021991164>

On August 16, TDI and NAD met with Matthew Berry of FCC Commissioner Pai's office, and Dave Grimaldi of Commissioner Clyburn's office to discuss our opposition to pending petitions for exemption from the Commission's IP closed captioning rules by some members of Digital Media Association (DiMA). <http://apps.fcc.gov/ecfs/document/view?id=7022004680>

Also on August 16, on behalf of TDI, IPR sent a letter to Hulu regarding an email exchange between a consumer who is deaf, and a customer service representative regarding Hulu's plans to support closed captioning on

Continued on page 25



TDI In Action

June 2012 - November 2012

Continued from page 24

various Apple devices.

On August 20, representatives from TDI, NAD, Gallaudet TAP, and HLAA met with officials of Media, and Consumer and Governmental Affairs Bureaus at the FCC to discuss the current rulemaking on the Second VPAAC Report as well as the need to subject apparatus manufacturers to timing or synchronization obligations. <http://apps.fcc.gov/ecfs/document/view?id=7022005998>

Also while at the FCC on August 20, TDI, Gallaudet TAP, and NAD met with Lyle Elder of FCC Chairman Genachowski's office, and Priscilla Argeris of Commissioner Rosenworcel's office to discuss our opposition to pending petitions for exemption from the Commission's IP closed captioning rules by some members of Digital Media Association (DiMA). <http://apps.fcc.gov/ecfs/document/view?id=7022005344>

On September 5, TDI, TAP and other consumer groups sent a letter to the FCC asking that it reconsiders some aspects of its Media Bureau's Memorandum Opinion and Order dismissing one petition by the Digital Media Association (DiMA) for partial exemption or limited waiver of the Commission's IP closed captioning rules (the "Rendering Petition") and granting another (the "708 Petition"). <http://apps.fcc.gov/ecfs/document/view?id=7022009566>

On October 9, TDI, NAD, and TAP met with officials of the Office of General Counsel and Consumer and Governmental Affairs Bureau to discuss CEAs IP captioning petition for reconsideration. <http://apps.fcc.gov/ecfs/document/view?id=7022031747>

On October 24, TDI issued an eNote inviting our members and others

to take part in our IP-captioning compliance survey.

Captioning Exemption Requests:

Between June and November 2012, TDI, NAD, DHHCAN, ALDA, CSD, and CPADO filed more than 60 comments on petitions from program producers to exempt their programming from the FCC's closed captioning rules.

Broadband NOI:

On September 20, TDI and other consumer groups submitted comments to the FCC in response to its Ninth Broadband Progress Notice of Inquiry ("NOI"). <http://apps.fcc.gov/ecfs/document/view?id=7022018034>

GLAD v. CNN:

On October 25, IPR filed an amicus brief on behalf of TDI, HLAA, and NAD in a case before the U.S. Court of Appeals for the Ninth Circuit in northern California, arguing that GLAD's attempt to require CNN to caption the videos on [CNN.com](http://cnn.com) under California accessibility law did not violate the First Amendment and was not precluded by federal captioning law or FCC standards. We agreed that requiring CNN to caption the videos on CNN.com is consistent with the First Amendment in the U.S. Constitution. <http://instituteforpublicrepresentation.org/wp-content/uploads/2012/11/TDI-et-al.-Amicus-Brief-12-15807-Final.pdf>

DMCA:

Around August 15, TDI, Gallaudet TAP, and NAD filed two letters with the U.S. Copyright Office on proposed exemptions 9A-9D regarding circumvention to facilitate perceptibility improvements for motion pictures and other audiovisual works delivered via Internet protocol

and on fixed disc-based media such as DVDs and Blu-Ray discs. We received an exemption only for the purpose of accessibility research from the anti-circumvention provisions of the Digital Millennium Copyright Act, based on request filed by TDI, Gallaudet, and the Participatory Culture Foundation in 2011.

Captioned Radio Project:

TDI reviewed captioned radio trials conducted by NPR Labs during the Presidential debates. This trial was open to the public where they can go to a specific website and follow the captioning. There were some technical glitches where the screen froze and no text was being generated. All in all, it was a successful test in that it highlighted weak areas for further tweaking. This followed a small scale Braille device trials during the summer, which were also successful. For updates, see <http://www.nprlabs.org/captioned-radio>

Biennial Report to U.S. Congress:

The CVAA has a provision that requires the FCC to send to Congress a report every two years detailing the complaints that it gets from Americans with disabilities and other stakeholders concerning new technologies that are not accessible to them.

On July 26, TDI, TAP and other consumer groups submitted comments to the FCC for its Public Notice on its draft report to US Congress on accessibility of communication technologies. <http://apps.fcc.gov/ecfs/document/view?id=7021994277>

On September 6, TDI and other consumer groups, along with the RERC on Telecommunications Access filed additional comments on the

Continued on page 26



TDI In Action

June 2012 - November 2012

Continued from page 25

FCC's draft Biennial Report to U.S.
<http://apps.fcc.gov/ecfs/document/view?id=7022009631>

On October 5, the FCC submitted the first biennial report to U.S. Congress as required by the CVAA.

Text-to-911:

The Emergency Access Advisory Committee (EAAC) endorsed Text-to-911 as an interim solution that could be implemented sooner than waiting for the entire Next-Generation-911 (NG-911) to be rolled out. Plans for NG-911 will feature video access with the dispatcher each time someone calls for emergency, but with more than six thousand 911 call centers throughout the country, funding for each call center and implementation will be long and varied. Some estimate that it could be between five to ten years from now. In the meantime, Text-to-911 can be implemented much sooner while we await the full rollout of NG-911.

In late November of 2011, the four major telecommunications carriers (AT&T, Sprint, T-Mobile, and Verizon) announced a joint agreement with the two leading public safety industry groups (NENA and APCO) to roll out text-to-911 by May 15, 2014. Since the nationwide implementation has already started with trials in certain jurisdictions and the adoption by 6,300 PSAPs will be long and varied, the carriers suggested a standardized error fall-back message that basically tells the caller by text "Your call cannot be completed, please call 911 by voice or TTY", and that will be in place by June 30, 2013. The consumer groups applauded the measures, even though we were not consulted for our feedback prior to the announcement.

Shortly after the industry announcement on text-to-911, the

FCC issued a notice of inquiry, which summarized the response of the Consumer Groups. The Consumer Groups urged the FCC to take the lead in establishing and mandating consistent standards and accessibility requirements for NG9-1-1. This will require the removal of all necessary jurisdictional barriers to create a governing framework. Every American regardless of his or her disability has a right to easy and convenient access to emergency services no matter where in the country he or she may be, either as a resident or while travelling. The Consumer Groups also urged the Commission to make sure that the legal and statutory framework allows the Commission to ensure efficient and accurate transmissions of all NG9-1-1 service. We believe that the Commission is in the best position to lead the transformation to NG9-1-1 and this leadership is necessary to avoid inconsistency, confusion, waste, and barriers to accessing NG9-1-1.

On June 25, Verizon had a conference call meeting with Stout and other consumer advocates on the progress with its voluntary text-to-911 emergency calling service in Durham, N.C. and a few other areas. Verizon has contracted with TeleCommunication Systems to provide the service.

On June 28, the FCC sponsored a meeting on text-to-911 outreach and training with consumer groups, including TDI, emergency services traded groups, and telecommunications industry. Consumers expressed concerns that education and outreach needs to emphasize that caller location must be sent first because location identifying technology can fall short in certain areas such as high rise office buildings or apartments. GPS may identify the street address but not the room number, which makes it difficult on a multi-story buildings.

On July 12, Dr. Christian Vogler invited TDI and other consumer advocates to meet with officials of TeleCommunication Systems at Gallaudet to discuss how best TCS and Verizon implement the text-to-911 interim solution for our emergency calling needs.

On September 28, Stout sent an email to key consumer members of the Emergency Access Advisory Committee (EAAC) asking whether some in the industry were providing good grounds to delay implementation of text-to-911 emergency calling for the nation's deaf and hard of hearing population.

On November 6, TDI issued an eNote inviting our members and others to participate in the Text-to-911 survey.

On November 8, Stout sent an email as Chair of the DHHCAN to the five FCC Commissioners and their legal advisors asking that they not delay their plans in the upcoming Report and Order, and Further Notice of Proposed Rulemaking to require wireless carriers and other stakeholders implement and deploy the text-to-911 emergency calling interim solution with participating 911 centers across America. <http://apps.fcc.gov/ecfs/document/view?id=7022039159>

On November 29, advocates from TDI and other consumer groups met with the legal advisors from Offices of Commissioner Pai. They were then joined by Gallaudet TAP, and met with the staff from Offices of Chairman Genachowski and Commissioner Clyburn on the FCC's tentative plans for the Report and Order, and Further Notice on Proposed Rulemaking for 9-1-1 emergency services via text messaging. <http://apps.fcc.gov/ecfs/document/view?id=7022074023>

Continued on page 27



TDI In Action

June 2012 - November 2012

Continued from page 26

Community Emergency Preparedness Information Network (CEPIN) Project:

We continue to provide training workshops for our first course in St. Louis, Missouri and Gainesville, Florida. For the second course, nearly everything is completed with the National Terrorism Preparedness Institute, Center for Public Safety Innovation, St. Petersburg College in St. Petersburg, Florida.

On November 1, TDI issued an eNote sharing the information from the FCC on resources and services available for those affected by the superstorm Hurricane Sandy.

Misc.

On August 17, TDI assisted NAD with a declaration statement for the case of a federal worker against the U.S. Department of Treasury because she was not allowed to have a

videophone in her office to access VRS or to have communication directly with her contacts that use sign language.

On August 30, TDI and NAD met with officials at Equal Rights Center (ERC) to review the results of a survey that concluded there had been a substantial discrimination against people who called via relay services seeking housing.

On September 4, Telecommunications Industry Association (TIA) invited Stout and other consumer advocates to attend its meeting on its plans to file a request with the FCC to issue a Notice of Proposed Rulemaking ("NPRM") to improve access and experience of hard of hearing users of terminal equipment by updating the hearing aid compatibility volume control requirements.

On September 10, Stout, House, and Phillips (NAD) took part in a meeting with Blake Reid, TDI's pro bono legal services coordinator at the Institute for Public Representation, Georgetown University Law School, and his three

interns – Jessica Lee, Hillary Hodsdon, and Victoria Ajayi to discuss plans with their work this fall on TV and Internet captioning issues.

On September 15, Time Warner Cable (TWC) invited TDI to give input on a research paper about broadband access issues, written by Dr. Krishna Jayakar, Associate Professor, College of Communications, Penn State University. This paper was produced as part of TWC's Research Program on Digital Communications.

On October 9, Stout and House participated in a DHHCAN event in Fairfax, Virginia. DHHCAN sponsored a U.S. Presidential Candidates Forum. Jonathan Young, an attorney with FoxKiser in Washington, D.C. represented the Obama campaign at the Forum. Unfortunately the Romney campaign could not send a representative. About 35 people attended the Forum, and Mr. Young received a good amount of feedback to share with others in the Obama campaign, and for his service as Chair of the National Council on Disability.

FACTS AND FAQS Continued from page 18

When Will Text-to-911 Become Widely Available?

AT&T, Sprint, T-Mobile, and Verizon have voluntarily committed to provide text-to-911 service by May 15, 2014 in all areas served by their networks where a 911 call center is prepared to receive texts.

To speed up the nationwide availability of text-to-911, the FCC has also proposed rules for public

comment that would require all other wireless telephone companies and certain providers of text messaging applications to likewise provide text-to-911 by May 15, 2014 in all areas where a 911 call center is prepared to receive the texts.

Text-to-911 deployment will therefore happen gradually, depending in part on when local 911 call centers prepare their systems to receive texts.

More Related Documents

The Commission's Order (adopted May 8, 2013) on "bounce-back" messages is available at <http://www.fcc.gov/document/text-911-bounce-back-message-order>.

The Commission's other current proposals regarding text-to-911 are in a Further Notice of Proposed Rulemaking (FCC Docket 12-149), available at <http://www.fcc.gov/document/text-911-further-notice-proposed-rulemaking>.



TDI In Action

June 2012 - November 2012

Continued from page 27

TDI RECEIVES PRESTIGIOUS NAD AWARD FOR ADVOCACY ON CAPTIONING

TDI is honored to have been one of the recipients of the highly esteemed Accessibility Award from National Association of the Deaf (NAD) during its biennial conference in Louisville, Kentucky on July 4. TDI's pro-bono attorneys at the Institute for Public Representation (IPR) and captioning software company, Computer Prompting and Captioning (CPC) were the other two recipients of this award.

TDI, IPR, and CPC received this award for their collective work alongside NAD in advocating for maximizing the reach and effects of the 21st Century Communications and Video Accessibility Act (CVAA) including the promulgation of strong rules in favor of increased quantity and quality of captioning on the Internet.

"The presentation of biennial awards formally recognizes individuals and organizations across the country that have played a role in advancing the civil, human and linguistic rights of the deaf and hard of hearing American community," said NAD President Bobbie Beth Scoggins. "The Accessibility Award is presented to individuals or organizations in recognition of exceptional commitment to advancing the accessibility rights of deaf and hard of hearing Americans in a way that also benefits the public at large."

"TDI is honored to receive such a highly esteemed honor from one of our sister advocacy groups, NAD" said Claude Stout, Executive Director. Stout adds, "We could not have been able to extend the captioning regulations online without the help of our co-honorees at IPR and CPC. Furthermore, TDI also acknowledges the passion that many consumer



TDI RECEIVES PRESTIGIOUS NAD AWARD FOR ADVOCACY ON CAPTIONING
 Shares Honors with Institute of Public Representation and Computer Prompting & Captioning
 2012 NAD Accessibility Award Recipients (L-R): Sheri Farinha, former NAD Board Secretary; Claude Stout, TDI Executive Director (on behalf of IPR), Dr. Roy Miller, TDI Board President; and Sid Hoffman of CPC.
 Photo from iDeaf News.

advocates and other stakeholders have poured into our efforts in making online captioning a reality. This would not have been possible without the help of our friends and supporters throughout the captioning industry."

"IPR was specifically recognized for "Exemplary Commitment to a Barrier-Free Internet" for its work on behalf of TDI," said Blake Reid, Esq. Reid adds, "Over the past year, IPR has represented TDI on a variety of accessibility policy issues, including a landmark rulemaking at the Federal Communications Commission requiring closed captioning for Internet Protocol-delivered video for the first time and a

pending proposal at the United States Copyright Office to exempt the addition and improvement of video accessibility features like closed captions and video description from the anticircumvention measures of the Digital Millennium Copyright Act."

"It is very fitting that on Independence Day, CPC is receiving the Accessibility Award for developing software that helps people live independently," said CPC Vice President and co-founder Sid Hoffman. "On July 4, 1776, our country as a whole received independence. Each and every day Americans are becoming more independent as individuals through the use of closed captioning technology."

We at TDI are extremely proud of this terrific accomplishment, and we look forward to seeing the results of our efforts toward an accessible Internet being implemented over the next few years.



Logos from (L-R): National Association of the Deaf, Telecommunications for the Deaf and Hard of Hearing, Institute for Public Representation (Georgetown University), and Computer Prompting & Captioning

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Janice Lyons, who is deaf and was invited to test out using text messaging to communicate with 911 E-Comm operators, is photographed at the Western Institute for the Deaf and Hard of Hearing in Vancouver on March 19, 2014.

Rafal Gerszak for The Globe and Mail

Text-To-911 Service For Hearing Impaired Introduced In B.C. First

EDITOR'S NOTE: Text-to-911 is also being used or under development in other countries around the world. While the technologies are similar, Canada (T911), England (EmergencySMS to 112 or 999), and other countries restrict texting for emergency services to registered callers who are deaf, hard of hearing or have speech disabilities. In the U.S., anyone can use text to call 9-1-1 depending on service availability and during certain circumstances such as kidnappings or domestic violence where it would pose a danger if a voice call was made. Here we see how the Canadians approach texting for emergency assistance.

From <http://www.theglobeandmail.com/news/british-columbia/text-to-911-service-for-hearing-impaired-introduced-in-bc-first/article17590596/>

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Vancouver — Special to The Globe and Mail
Published Thursday, Mar. 20 2014, 2:08 PM EDT
Last updated Friday, Mar. 21 2014, 11:38 AM EDT

For the hearing impaired, calling 911 can add frustration and peril to an already urgent situation, often ending with panicked runs to neighbours or bystanders for help.

This week, members of Vancouver's hearing impaired community became

the first Canadians who could communicate with 911 operators via text message. The service won't be available to the wider public, because hearing-impaired users must first register their phones with authorities. And only a few areas will have the service for now.

Known as T911, the change was required by federal regulators and is a significant development for a community long dependent on bulky teletypewriters.

"This is something we've waited many years for. This gives me my independence to contact emergency services; now I'm just as free as anyone else," Janice Lyons, a service leader at the Western Institute for the Deaf and Hard of Hearing said through a sign-language interpreter.

The service, launched on Tuesday, is available in Metro Vancouver and some communities along the Sunshine Coast

Continued on page 31

Continued from page 30

and Squamish Lillooet region. Under the system, registered phones dialling 911 can be connected with operators and a text-message session will be initiated. The operators will still be able to hear sounds from the user's phone and track its location.

"It's an incremental improvement to what we already have," said Chris Langdon, a vice-president at Telus Corp. "We are going to roll out sequentially as operators are ready across the country."

Ms. Lyons was invited to test the new system before it was launched. She advised local 911 provider E-Comm to simplify the language in its texts, asking that words like "concise" be replaced by "short." Many in the hearing impaired community have a grasp of English only as a second language.

"Once you start adding complex English structure and vocabulary it becomes confusing, especially when people are in a panic," she said.

The new system required a number of technical tweaks to the local mobile phone network. The quick rollout in the Lower Mainland was aided by the local 911 provider, considered one of the most advanced in the country. Proud of being first to introduce the service, E-Comm's Doug Watson said that many more operators across the country "were hot on their heels."

Calgary's 911 service will follow on Monday. While federal regulators mandate that the required technology be

installed by Jan. 24, no other definitive plans have been made elsewhere in Canada to introduce the service. The piecemeal rollout has been questioned by some critics.

"While this is a good day, it also points out the need for national-level

public and private providers across the country. Each must approach the switch to T911 individually, while working with local mobile service providers.

While users will soon be able to register their phones in Canada's largest city, both the Toronto Police and the Ontario

Provincial Police have warned regulators about the challenges of implementing T911.

"In spite of our best efforts, we and many [operators] across Canada will not be ready," the OPP warned in a letter on March 14, calling on federal regulators to "reverse the decision or discourage the practice" of sending texts on 911 networks.

In the United States, text-to-911 service is available throughout the states of Maine, Iowa and Vermont.

Verizon also offers the service in scattered counties across the country.

A report delivered to the Canadian Radio-television and Telecommunications Commission last October by former commissioner Timothy Denton warned of "shortcomings" in Canada's national 911 system that threatened to see the current patchwork network fall apart as consumers adopt new technologies that strain increasingly antiquated call centres.

Authorities continue to caution that texts to 911 will not work for the vast majority of Canadians.

"This is something we've waited many years for. This gives me my independence to contact emergency services; now I'm just as free as anyone else."

— Janice Lyons



co-ordination," said Lance Valcour, the outgoing executive director of the Canadian Interoperability Technology Interest Group. "Just because it works on one network, it doesn't mean that all the pieces – technical, policy, governance – have been put in place behind the scenes everywhere."

Ms. Lyons has already spoken with rural residents of British Columbia disappointed that they will not have access to the new service.

No federal agency is currently responsible for co-ordinating Canada's 911 system, operated by hundreds of



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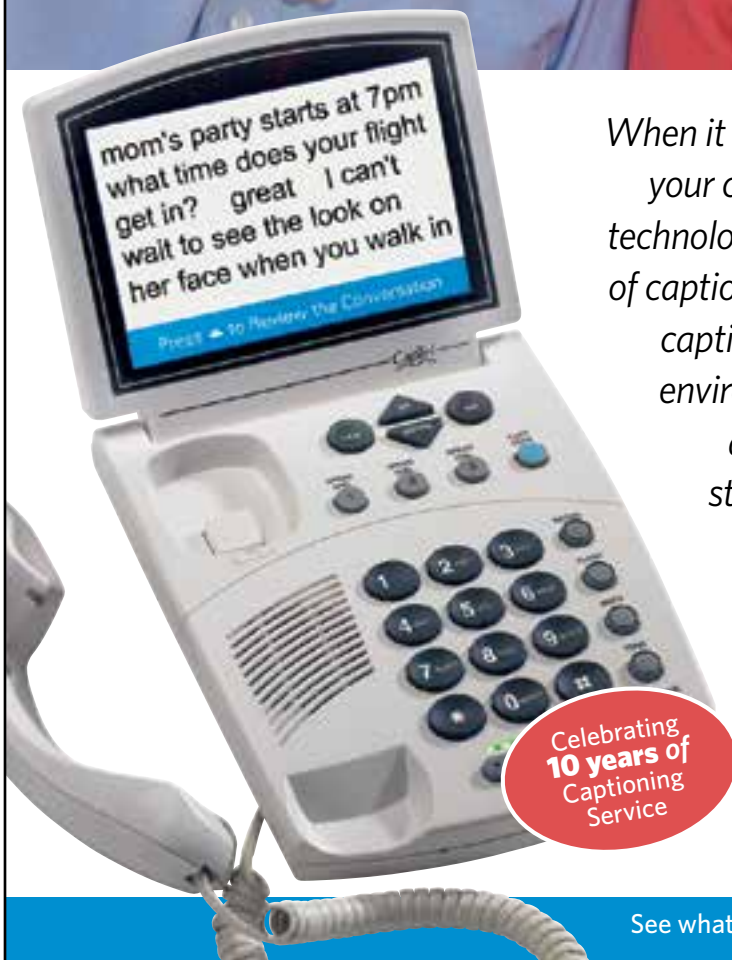
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