



# WORLD

Technology News and Commentary for Deaf and Hard of Hearing People

Introducing the



## TRAINING INSTITUTE

**BEGINS ON PAGE 8**

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### ALSO INSIDE:

Text-to-911 and RTT - pg 10

Quality TV Captions - pg 11

Emergency Notifications - pg 12

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**“TDI shapes America’s public policy in telecommunications, media, and information technology to advance the interests of all people who are deaf, hard of hearing, late-deafened, deafblind, and deaf+.”**

## FEATURE STORIES

- Partnering with 9-1-1 Centers for Text-to-9-1-1 & Real-Time Text..... pg 10**
- Working Together for Quality TV Captions..... pg 11**
- Understanding How Emergency Notifications Work..... pg 12**
- Direct Video Services..... pg 14**

## REGULAR COLUMNS

- Board Views: Knowledge is Power ..... pg 2**  
By Jan Withers, TDI President
- Capitol Commentary: Making Policy Work to the Benefit of All ..... pg 4**  
By Claude Stout, TDI Executive Director
- Quest for Access: Training Consumers to Advocate for an Accessible World.. pg 6**  
By Eric Kaika Director of Public Relations
- TDI in Action (June - August 2019)..... pg 19**

### Thanks to These Advertisers:

**ALDA, pg 7 • Hamilton Relay, inside front cover • Maryland Relay, pg 7**  
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# WORLD

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**Shaping An Accessible World**

## Board Views



**JAN WITHERS**

*TDI President and Board Member,  
Southwest Region*

**“Historically, TDI’s focus has been on policy advocacy at the national level, but TDI also recognizes that states are where the “rubber hits the road” when it comes to applying policy and promoting greater independence through the use of accessible technology.”**

## Knowledge is Power

**I** have a confession.... I am a relative dinosaur when it comes to technology. I was one of the last to adopt BlackBerry (remember it?) and one of the last to give it up – kicking and screaming- for a smartphone. So... why the heck am I serving on TDI’s Board of Directors?

There are several significant digital divides. We all know about the divide created by barriers to accessibility in technology. We know also there are broadband deserts in many parts of America. Even where there is broadband, the high cost of devices and services put them out of reach for millions of Americans. Fortunately, there are organizations and resources (such as Lifeline, Telecommunications Equipment Distribution Program, and ICanConnect) working to close the gap.

My reason for joining TDI and serving on the Board is the two specific digital divides that concern me particularly. One divide arises out of the fact many Deaf, Hard of Hearing, and DeafBlind Americans lack the knowledge and/or personal wherewithal they need to access the technology that works for them, to use it well, and/or to effectively advocate for their access at the local or state level. In a way, I can relate as I can be a reluctant adopter of emerging technology and sometimes feel overwhelmed by the pervasiveness of web-based, app-based or wireless systems for doing business in so many aspects of daily life: ordering take-out food, paying utilities bills, banking, scheduling a healthcare appointment, participating in a work- related meeting remotely, registering for and participating in a workshop, applying to renew a professional license, and ad nauseum. And the COVID-19 pandemic has accelerated the emergence of and reliance on technological solutions.

And THEN there’s the question – are they accessible to us? Yet, I realize I am very privileged as I do possess the knowledge, skills, and interpersonal resources to adequately handle, if not master, all this technology to function well in today’s world. Far too many Americans, however, are not so privileged and in fact truly struggling or entirely left behind.

Another divide that concerns me is the fact that innovators, entrepreneurs, and corporations often do not even consider accessibility when developing and/or upgrading their devices, platforms or services. Federal accessibility laws by and large are inadequate simply because so many of them are unaware of their legal obligations until after their products have been released and complaints filed. You can’t bake good blueberry muffins when you have to add the blueberries after the mix has come out of the oven. Numerous telehealth platforms are excellent current examples of products and services developed without accessibility features built in. Consequently, work is needed to correct the problem after the fact. Clearly, we need a concerted and strategic approach to raise awareness and build the knowledge base necessary to foster proactive and organic incorporation of accessibility features in all design endeavors.

This is where TDI’s Training Institute comes in. TDI has its biennial TDI Conference, so how is the Training Institute different? The TDI Conference’s traditional focus is on policy pertaining to accessible communication and information technology; presentations, exhibits and demonstrations of technology tend to be geared to those already knowledgeable on policy and accessible technology and capable of absorbing new complex, technical



**BOARD VIEWS** Continued from page 2

information. The Training Institute, on the other hand, is intended to provide practical information in such a way that it could then be quickly applied by anyone on the ground, or where “the rubber hits the road.”

Training Institute topics could include strategies for advocating for accurate captioning with your local TV station, advocating for your city or county government to activate their PSAP’s text-to-9-1-1 service, and how to enhance your capability to receive accessible emergency alerts and so forth. Trainings would be provided in a variety of ways throughout the year, such as asynchronously (that is, simultaneously live on-site, live streaming and recorded) or completely

virtual such as through webinars, reaching far more people than a traditional on-site conference ever could. Not only would the Deaf, Hard of Hearing, and DeafBlind consumers benefit from the Training Institute’s offerings but also the organizations and agencies serving this population which in turn could apply their new knowledge with their local consumers. Another target audience is the group of professionals, such as project managers, who design and develop technological products and services. CEUs could be offered, creating an incentive for them to register with the Training Institute, hopefully resulting in increased awareness of federal accessibility laws and practical knowledge enabling their compliance with said laws.

The Training Institute, of course, is not intended to be THE solution to closing the two digital divides that so concern me; the scope of needs is just too enormous and the technological advances developing too rapidly. Rather, it is intended to be a vehicle through which TDI’s large network of partners could contribute to the work to address these digital divides. Ultimately, TDI and its partners would rely on input from consumers and stakeholders on the ground to guide the Training Institute in delivering what they need. The reward would come from seeing people apply their newly-attained knowledge, skills and resources to achieve equity through effective use of accessible technology wherever they live.



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## Capitol Commentary



BY CLAUDE STOUT  
*TDI Executive Director*

**“(The Institute) gives TDI some opportunities to branch out its continued success in public policy development at national/federal level to providing crucial training in this area with key movers and shakers at state/local levels.”**



# TRAINING INSTITUTE

## Making Policy Work to the Benefit of All

**J**ust a few weeks ago, the COVID-19 pandemic had created an unprecedented impact on TDI's daily operations. We were about to host the Training Institute on April 7, 2020 at Turf Valley Resort and Conference Center in Ellicott City, Maryland, about twenty miles south of downtown Baltimore, Maryland. As the events unfolded, leading to a nationwide spread of the virus, and states issuing bans for gatherings larger than 250, we reviewed our contract with the hotel. As a result, we made the decision to postpone the Institute to a later date. We hope to have the Institute sometime this fall. Going forward, Eric, the new TDI CEO will keep TDI's members, program presenters, sponsors, and other interested parties informed on resumption of the plans with the Institute. We are most grateful to fifteen corporations, trade groups, and educational institutions for their sponsorship of the Institute.

Even though we have postponed the Institute to later this year, Eric wants to use this issue to promote our plans for the Training Institute with as much advance time as possible. Then when we announce the new date for the Institute, those who are considering attending, can then register right away for the Institute.

When we developed the plans for the Institute, we came up with a number of goals with the Institute.

1) This gives TDI some opportunities to branch out its continued success in public policy development at national/federal level to provide crucial training in this area with key movers and shakers at state/local levels. In the last forty-six years, the twenty-three Conferences have served us well, getting key stakeholders (consumer advocacy groups, academia, industry, and government) to convene in one place every two years for three

**CAPITOL COMMENTARY** Continued from page 4

days in the summer, and to review public policy issues with TDI. Those who have attended the Biennial Conferences were representatives from industry and government with key national roles in public policy and accessibility.

2) There has not been enough opportunity to offer as much consumer education as a part of the Conference program. We envision having the Institute function as a national training event with a number of workshops for a full day during every off-TDI Biennial Conference year.

3) Then if we succeed with the one-day national program with the Institute this fall in year 2020, we follow up with four separate one-topic webinars to take place by the end of year 2020. Benefits of webinars as “sequels” to the in-person event are as follows:

- Participation in the webinar from home or office will benefit those across the nation who could not travel far to the metro Washington-Baltimore area to attend the all day in-person event.
- Captions/voicing/sign language will be provided for each webinar.
- An IChat feature will be offered as part of the webinar. There will be questions and answers from the participants online that are posted live during the webinar.
- Each webinar will be highly promoted with as many months in advance to involve as many local communities on a topic, such as distributing a fact sheet for this one topic and sharing it on social media, and/or posting it on TDI's website, and we hope that the workshops would inspire many to do their part on behalf of the deaf and hard of hearing in their local communities like collaborating with the local TV stations, 911 centers, and state/local governments.

We invite the following groups here from across the nation to take part in the Institute. They play a crucial role with the states/local communities to achieve full access in as many life activity areas for those who are deaf or hard of hearing and their hearing contacts. They are:

- A. leaders and members from national consumer advocacy organizations of, by, and for the deaf and hard of hearing like TDI, NAD, HLAA, DSA, ASDC, ALDA, NBDA, CPADO, AADB, DHHCAN, and CCASDHH.
- B. executive directors and their staff with commissions/councils of the deaf and hard of hearing.
- C. leaders, members, and/or staff from national professional organizations of, by and for the deaf and hard of hearing, like RID, ADARA, CEASD, NASRA, and TEDPA.
- D. management and staff from community service agencies and centers for independent living.
- E. representatives from schools for the deaf, and public school programs that serve a number of deaf and hard of hearing students. and
- F. deaf and hard of hearing students from colleges and universities, like Gallaudet, NTID, CSUN, and others.

With the Institute this fall, four workshops will be conducted as follows:

- Partnering with 9-1-1 Centers for Text-to-9-1-1 & Real-Time Text (Instructors: Toni Dunne - Hamilton NG9-1-1, and Richard Ray - City of Los Angeles, CA)
- Working Together for Quality TV Captions (Instructors: Blake Reid - Univ. of Colorado- Boulder, Suzy Rosen Singleton - Disability Rights Office, FCC, and Larry Walke, National Association of Broadcasters)

- Understanding How Emergency Notifications Work (Instructors: Richard Ray - City of Los Angeles, CA, and Harry Anastopoulos - CTIA)
- Direct Video Service: A New Alternative for Customer Service (Instructors: Craig Radford and Vannessa LeBoss - CSD, Tom Wlodkowski - Comcast, and Robert McConnell, FCC)

As you can see, the topics are very important for everyone to learn more about, and to support with information and activities for constituents that are deaf and hard of hearing in local communities. Not like our forebears, we find that under today's times, and also for the near future, that achieving life, liberty, and the pursuit of happiness in a level playing field with Americans without a disability will have us addressing some challenges that come our way, and under less available resources. In the end, we will experience the good life, according to how much we take the initiative in joint forces with other groups.

The nine-member TDI Board of Directors, led by Jan Withers, President has given full support for the promise and potential that the Institute stands to bring for TDI and the community in America. This is a great time for the Association to host the Institute with the introduction of Eric Kaika, its new CEO. We anticipate that the Institute will also assist in meeting other training needs like for officials responsible for accessibility of state and local governments, and engineers from accessibility labs with corporations and other entities. As we remain hopeful for resumption of normal activities in a month or two across the nation from the COVID-19 pandemic, please stay tuned for the next round of information on the Institute from TDI. Meanwhile, may you and yours stay safe and well during the COVID-19 pandemic.

## Our Quest for Access



BY ERIC KAIKA  
*Managing Editor*

**“It’s almost as if the stars aligned. People are working from home. Schools are utilizing distance learning. So why can’t the TDI Training Institute become an on-demand video platform?”**



## Training Consumers to Advocate for an Accessible World

**W**hen the TDI Training Institute was discussed, it was an intriguing concept - to provide consumers with hands-on training to better advocate at the local level for access in areas of telecommunications, media, and information technology.

The original plans had this one day event at a time when TDI would be announcing its new CEO and undergoing leadership transition. Attendees would have roughly an hour to be well armed in self-advocacy in pressing issues that require a strong united action on all fronts.

Then the covid19 pandemic hit as I was selected as the CEO of TDI. As disappointed as I was regarding the fact the TDI Training Institute wasn’t going to happen, I was determined not to see it tossed on the back burner and become a forgotten project. Education and awareness are important. Training people to have the ability to successfully navigate through man-made barriers and rise to achieve full access to quality of life is essential.

Fall is rapidly approaching and covid-19 shows no signs of letting up. Many states and companies still impose social distancing requirements, and rightfully so. After evaluation of Maryland, DC, and Virginia’s large crowd gatherings, and more importantly, the safety and health of TDI’s members and deaf and hard of hearing consumers, we felt it was premature to hold an in-person TDI Training Institute event. So we started to consider different approaches.

It’s almost as if the stars aligned. People are working from home. Schools are utilizing distance learning. So why can’t the TDI Training Institute become an on-demand video platform?

The vision of TDI Training Institute is to give everyone the opportunity, at their own pace, to choose from a multitude of videos done by subject matter experts and learn about

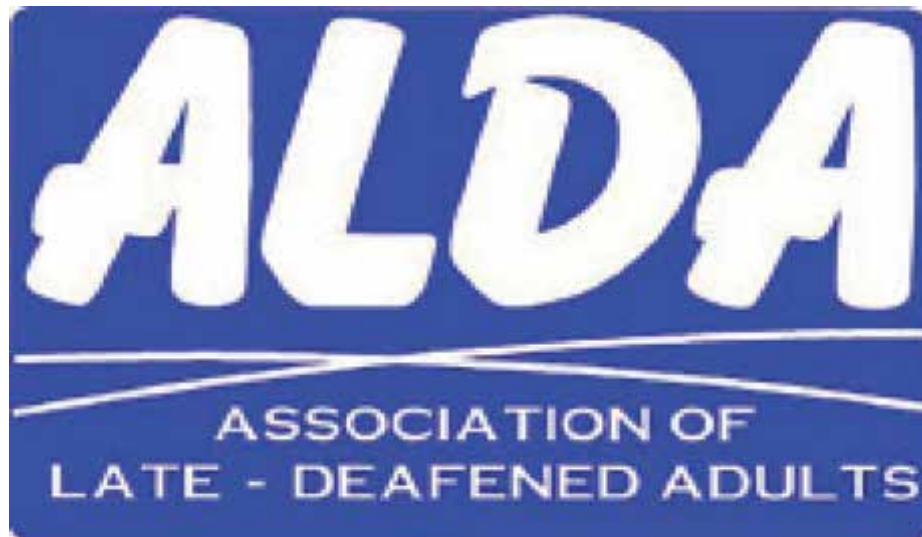


## OUR QUEST FOR ACCESS Continued from page 6

various accessibility issues within the telecommunication, media, and information technology sectors.

To launch the TDI Training Institute online video learning platform, we'll be starting with the same material we planned for the in-person event and continue to build on them. Viewers can learn about emergency communications, improvements in telecommunication relay, Real-Time Text (RTT), and more.

We're really excited about this and believe it will lead to greater things. Once consumers and industry players become immensely aware of the accessibility needs and requirements of consumers and existing infrastructure, we can all work together to achieve full access. It all starts with accessibility experts having a seat at the table.



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**The TDI Training Institute is a program that was created in late 2019, slated for April 2020. As we all know, the novel coronavirus (covid-19) became a worldwide pandemic, leading to the cancellation of the one-day event.**

**Due to the ongoing social distancing laws enforced around the nation, TDI has decided to not hold any type of in-person Training Institute at this time. However we cannot dismiss the importance of having a platform that allows consumers to learn more about self-advocacy.**

**TDI is moving towards an online, on-demand video platform to give consumers the opportunity to learn about accessibility issues in telecommunication, media, and information technology, or accessibility features needing improvements.**

**This issue was originally designed to share what we had planned for the April event. Instead we will showcase what will be one of the first videos we create for the new online platform. We are looking forward to sharing with you all our repository of online training videos. We already have several exciting ideas lined up for future training videos!**

**We welcome your recommendations on ideas or issues for videos to add to the TDI Training Institute.**

# SESSION 1

## Attendees will:

- Learn the regulations, deadlines, and status of text accessibility pertaining to 9-1-1.
- Know where to find RTT in your phone settings and what can be expected when making calls with RTT.
- Discover methods to work with 9-1-1 entities and encourage collaboration.

## Partnering with 9-1-1 Centers for Text-to-9-1-1 & Real-Time Text

### Instructors:

*Toni Dunne – Motorola Solutions*

*Richard Ray - City of Los Angeles, CA*

In an emergency, being able to communicate with 9-1-1 is critical! This session will review the status of text to 9-1-1 and Real Time Text (RTT) capabilities across the U.S., explore options for consumer advocates and professionals to work with public safety answering points (PSAPs), and encourage implementation of both text technologies for safety of Deaf and Hard of Hearing consumers.



**Toni Dunne, ENP** has over 30 years of experience working within the public safety industry and currently is the NGCS Customer Success Manager for Motorola Solutions. Throughout her career, she has been a staunch advocate for equal access to emergency services for individuals who are Deaf, Deaf-Blind, Hard of Hearing, and/or have Speech Disability and has served on grassroot committees and many 9-1-1 industry-related committees. She is a former Director on the National Emergency Number Association (NENA) Executive Board and was inducted into the NENA Hall of Fame. She is also a past president of the NENA Texas Chapter. Toni also served on the TDI Board, the NAD Emergency Access committee, the FCC Emergency Access Advisory Committee, was co-chair of the FCC Disability Advisory Committee's Emergency

Communications Subcommittee, and a member of the National 911 Office's NG911 Roadmap Committee. Currently Toni co-chairs the NENA Real-Time Text (RTT) Work Group to develop resources for 9-1-1 centers.



**Richard Ray** is the Technology Access Coordinator for the City of Los Angeles and he ensures that City Departments comply with the 1990 Americans with Disabilities Act. Mr. Ray is also involved in several projects such as Text to 9-1-1, Real-Time Text to 9-1-1, Next Generation 9-1-1, Emergency Notification Systems, and other issues concerning communication access in support of federal, state, and local governments. Mr. Ray is actively involved as a co-chair of the National Emergency Number Association Accessibility Committee and he is currently serving on the Federal Communications Commission (FCC) North American Numbering Council (NANC) - Interoperable Video Calling (IVC) Working Group. Mr. Ray has served as member of FCC Disability Advisory Committee and co-chair of Emergency

Communications Subcommittee for two terms. He has also served as co-chair for FCC Emergency Access Advisory Committee. Mr. Ray was recently inducted into the National Emergency Number Association Hall of Fame.





# SESSION 2

## Working Together for Quality TV Captions

**Instructors:** *Blake Reid – Univ. of Colorado- Boulder,*  
*Suzy Rosen Singleton – Disability Rights Office, FCC*  
*Larry Walke – National Association of Broadcasters*

This session will give step-by-step guidance for consumer advocates and service professionals on how to work with local TV stations, programming producers, and the FCC to resolve issues with the quality of captions on live video programs. Participants will receive a brief overview of the live television closed captioning landscape, including historical and contemporary developments in live captioning technology and the FCC's involvement in overseeing the provision and quality of captions. Discussions will be led in FCC's quality rules and complaint mechanics, focusing particularly on what consumers, advocates, and industry colleagues can do to help observe, raise, and prevent problems from recurring. The session will close with a discussion of the ongoing work of the FCC's Disability Advisory Committee on a recommendation for improvements to captions generated using the Electronic Newsroom Technique (ENT) and associated ENT Coordinator Toolkit, and the ongoing work of broadcasters to foster working relationships with national and local deaf and hard of hearing consumer advocacy organizations to improve the quality of television captioning.



**Blake E. Reid** studies, teaches, and practices at the intersection of law, policy, and technology. He's a Clinical Professor at Colorado Law, where he serves as the Director of the Samuelson-Glushko Technology Law & Policy Clinic (TLPC). Blake has served as TDI's pro bono counsel on a variety of captioning issues since 2011.



**Suzy Rosen Singleton**, a native user of American Sign Language, is the Chief of the Disability Rights Office of the Consumer and Governmental Affairs Bureau of the Federal Communications Commission (FCC). Since 2016, she oversees rulemaking proceedings and stakeholder activities to ensure accessible emergency communications, modern communication technologies, and video programming for millions of individuals with disabilities. Since 1992, her disability policy expertise involved work as a litigator for the California Center for Law and the Deaf, government affairs counsel of the National Association of the Deaf, special education law compliance officer of the U.S. Department of Education, the ombuds of Gallaudet University, and an attorney with the FCC. Suzy is a member of the bar of the District of Columbia and holds a Juris Doctor from the UCLA School of Law, and a Bachelor of Science in Political Science from the University of California, Berkeley.



**Larry Walke** joined the National Association of Broadcasters in October 2001 as associate general counsel. While at NAB, Larry has focused his efforts on safeguarding broadcasters' spectrum, a range of radio policy issues, EAS and emergency preparedness, political broadcasting and other advertising issues, Equal Employment Opportunity, and license renewals, among other matters. Larry began his legal career at the Federal Communications Commission (FCC), where he worked on a broad range of broadcast and cable television policy issues. Prior to NAB, Larry worked for a large DC-based law firm and a competitive telecommunications provider. A graduate from Duke University with dual majors in public policy studies and economics, Larry also received his J.D. from Washington University Law School in St. Louis, Mo., where he served as an executive editor of the Law Review.

## Attendees will leave the session with:

- An understanding of the contours of the FCC's captioning provision and quality rules for live television programming;
- An understanding of the mechanisms for consumers and advocates to communicate with television stations and the FCC, including filing complaints, about problems they encounter with closed captions for live television programs; and
- A better understanding for how to foster positive and inclusive relationships between local television stations and deaf and hard of hearing organizations.

# SESSION 3

## Attendees will leave the session with:

- Understand the needs of people with disabilities during an emergency.
- Identify different types of warning signals used to alert the public to an emergency, including the evolution of the wireless emergency alert system.
- Summarize the accessibility criteria used to evaluate public information provided during emergency notification situations.

## Understanding How Emergency Notifications Work

### Instructors:

*Richard Ray – City of Los Angeles, CA*

*Harry Anastopulos – CTIA*

This session will outline the various types of Emergency Notification Systems and how they are transmitted. Participants will learn of the existing issues with the notification systems. Discussion will cover how Attendees receive a list of resources developed by emergency responders related to preparing, responding, and/or recovering from disasters. Learn about which notifications come directly to us, as required by law, and others which we must voluntarily register, including the Emergency Alert System (EAS), the Wireless Emergency Alerts (WEA), and the National Oceanic and Atmospheric Administration (NOAA) Weather Radio. The audience will learn how to work with local emergency management agencies to ensure all alerts are inclusive to the community.

This session will outline the various types of Emergency Notification Systems and how they are transmitted. Participants will learn of the existing issues with the notification systems. Discussion will cover how



**Harry Anastopulos** is an attorney and director of external affairs at CTIA, where he focuses on 5G infrastructure, wireless spectrum, privacy, digital security/safety, and emerging technology issues relating to diverse communities. He previously worked for U.S. Senators Maria Cantwell, Ben Cardin, and Jeanne Shaheen, as well as the intellectual property practice group of a boutique law firm in D.C. He earned a J.D. from Georgetown University Law Center and a B.A. from Brown University.



**Richard Ray** is the Technology Access Coordinator for the City of Los Angeles and he ensures that City Departments comply with the 1990 Americans with Disabilities Act. Mr. Ray is also involved in several projects such as Text to 9-1-1, Real-Time Text to 9-1-1, Next Generation 9-1-1, Emergency Notification Systems, and other issues concerning communication access in support of federal, state, and local governments. Mr. Ray is actively involved as a co-chair of the National Emergency Number Association Accessibility Committee and he is currently serving on the Federal Communications Commission (FCC) North American Numbering Council (NANC) - Interoperable Video Calling (IVC) Working Group. Mr. Ray has served as member of FCC Disability Advisory Committee and co-chair of Emergency Communications Subcommittee for two terms. He has also served as co-chair for FCC Emergency Access Advisory Committee. Mr. Ray was recently inducted into the National Emergency Number Association Hall of Fame.

# *Thank You*

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# SESSION 4

## Attendees will leave the session with:

- Understanding Connect Direct, how it works, and its benefits.
- How to advocate federal agencies and corporations to adopt a direct video service platform.

## Direct Video Services: A New Alternative for Customer Service

### Instructors:

*Craig Radford - CSD*

*Vannessa LeBoss- CSD*

*Tom Wlodkowski - Comcast*

*Robert McConnell - FCC*

A growing number of corporations like Google, Microsoft, Comcast, as well as federal agencies have implemented a new direct video customer service solution for the American Sign Language community. This platform allows customer service centers to directly communicate in ASL with callers who are deaf or hard of hearing. Attendees learn how to make calls on the Connect Direct platform, the FCC's stance on these platforms, and how to advocate other corporations/government agencies to enable direct video service for their organizations.



**Craig Radford** is the Vice President of Strategy and Business Development for CSD, and has been shaping the advancement of communication for the Deaf community for more than 20 years. He was one of the first few minds to shape the Video Relay Service (VRS) industry and he expanded employment opportunities as a two-time entrepreneur for his local community. After holding various positions in the telecommunications industry, four years ago he helped launch Connect Direct, a subsidiary of Communication Service for the Deaf (CSD), and has worked with large organizations with like-minded accessibility goals, such as the American Red Cross, Comcast and Google, providing direct services in sign language for equitable communication access and creating employment opportunities within the deaf community.



**Vannessa LeBoss** Vannessa LeBoss is the Director of Connect Direct, responsible for creating and bridging the connections between target organizations and Connect Direct for direct video services. She is also the cofounder of 360 Empower Consulting, where she provides consultation specific to improving access for organizations. Prior experience includes nineteen years with the ASL Services Corporation (ASLS), where she was the Chief Operations Officer who played a major role in building ASLS from a startup sign language interpreting agency with three employees and seven contractors in 1996, to one of the ten largest sign language interpreting agencies in the United States, with over 180 employees and 800 contractors nationwide.



**Tom Wlodkowski** is Vice President of Accessibility at Comcast. In this role, Tom is responsible for driving the design and development of inclusive experiences through product innovation and superior customer support. His vision to empower and delight people of all abilities with world-class entertainment, communications, and smart home experiences has brought Comcast to the forefront of the accessibility space.



**Robert McConnell** is a Telecommunications Accessibility Specialist with the Disability Rights Office of the Consumer and Governmental Affairs Bureau of the Federal Communications Commission, where he liaises with various government agencies/divisions and private enterprises to solve complex technical and policy accessibility issues, and leads numerous IT process improvements within the Commission. In addition, Robert helps develop and guide Research & Development (R&D) strategies toward further equivalency in telecommunications for people of all abilities through the use of innovative technologies. Robert received his Bachelor's degree in Communication Studies from Gallaudet University.





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- **DEAF AND MAINSTREAM SCHOOLS**
- **INTERPRETERS, CAPTIONING PROVIDERS, RELAY PROVIDERS**
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- **AND MORE!**



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Mother and son at the New Jersey Walk4Hearing. Find out about the fall Walks at [walk4hearing.org](http://walk4hearing.org).





## Shaping an Accessible World

Hello Reader,

This will be the first letter I write as your new CEO. I am humbled to assume the mantle of leadership in support of TDI's mission. I would like to thank Claude Stout and his 23 years of distinguished service and leadership. I am determined to build on TDI's past successes by forging new paths.

In the midst of this exciting time for TDI, we must also recognize how the COVID-19 pandemic has upended our world in ways we could not have imagined a year ago. For the last couple months, I have been spending more time at home with my family and have gained a tremendous appreciation for our community. The quarantine has allowed me to recognize how fortunate I am to enjoy the past efforts of TDI in my daily interactions with technology. However, it has also empowered me to seek new solutions for challenges and obstacles we all face as deaf & hard of hearing community members.

I am excited to share with you my vision of TDI and the new paths we will explore. Keep an eye out for the TDI World (volume 51, issue 4) quarterly magazine for an in-depth look at the new avenues TDI will travel.

There are two things that I would like to share with you immediately.

1. **Membership fees have been restructured** and will now be an **affordable annual rate of just \$25**. If your membership is expired, **you can easily renew online at: [TDIforAccess.org](https://www.TDIforAccess.org)**
2. I am also thrilled to announce the grand opening of our **online Blue Book**. Check out [TDIBlueBook.com](https://www.TDIBlueBook.com) to see the historic migration of this treasured resource of the deaf & hard of hearing community from print to digital.

TDI has always been a member-valued organization and I would like to personally extend an invitation to each and every one of you to reach out to us and collaborate on our new vision for TDI's future. I welcome your ideas and look forward to working with you on accessibility issues.

All for Access,



Eric Kaika  
CEO, TDI

# **Novel Coronavirus (COVID-19) Resources and Guidance**

**for the Deaf and Hard of Hearing Community, as well as Medical  
Providers working with Deaf and Hard of Hearing Patients:**



**CSD**

<https://www.csd.org/coronavirus>



**National Association of the Deaf**

**National Association of the Deaf**

<https://www.nad.org/coronavirus>



**NDC**

**National Deaf Center  
on Postsecondary Outcomes**

**National Deaf Center**

<https://www.nationaldeafcenter.org/covid-19-information>



**TDI**

<https://tdiforaccess.org/covid-19>





# Individual Membership Application Form

As a TDI Member, you will automatically receive a copy of the Blue Book, our quarterly TDI World, and e-Notes. Save time and postage! Renew online: [TDIforAccess.org](http://TDIforAccess.org)

**Bold** = *required* information.

**Name** (first, middle, last): \_\_\_\_\_

**Mailing Address:** \_\_\_\_\_  
(street) (city) (state) (zip code)

**Email Address:** \_\_\_\_\_ **Birthdate:** \_\_\_\_\_

|                    |  |                      |  |
|--------------------|--|----------------------|--|
| <b>Home Phone:</b> |  | <b>Mobile Phone:</b> |  |
|--------------------|--|----------------------|--|

**TDI Blue Book is now online: [TDIBlueBook.com](http://TDIBlueBook.com)**

*TDI Blue Book is available online!  
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Visit [TDIBlueBook.com](http://TDIBlueBook.com) and add your contact information  
for other TDI Members to get in touch with you.  
Find businesses owned, managed, or marketed to deaf  
and hard of hearing consumers.*



| Membership fees | Annual |
|-----------------|--------|
| Individual:     | \$25   |

Membership fee: \$

Donation (optional) \$

TOTAL \$

Donations to TDI are Tax-Deductible Contributions (#35-1146784).  
You will receive an end of the year contribution summary.

Credit card number:

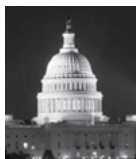
Expiration: CVV / CV1:

If paying by check, make payable to: **TDI** (bounced checks will incur \$35 fee)

Mail form & payment: **TDI, 945 Thayer Ave #8009, Silver Spring, MD, 20910**

***Thank you for supporting TDI !***





# TDI In Action

September – November 2019

AADB = American Association of the Deaf Blind  
 ALDA = Association of Late Deafened Adults, Inc.  
 ASDC = American Society of Deaf Children  
 CC – closed captioning  
 CCASDHH = California Coalition of Agencies Serving Deaf and Hard of Hearing, Inc.  
 CGB = Consumer and Governmental Affairs Bureau  
 CPADO = Cerebral Palsy and Deaf Organization  
 CTS – Captioned Telephone Service  
 DHHCAN = Deaf and Hard of Hearing Consumer Advocacy Network  
 DRO = Disability Rights Office  
 E-911 – Enhanced 911  
 FCC = Federal Communications Commission  
 FNPRM – Final Notice of Proposed Rulemaking  
 HLAA = Hearing Loss Association of America  
 IP – Internet Protocol

NAD = National Association of the Deaf  
 NBDA = National Black Deaf Advocates  
 NG-911 – Next Generation 911  
 RERC-TA = Rehabilitation Engineering Research Center on Telecommunication Access  
 SCAT/SCABT = Speech Communications Assistance By Telephone, Inc.  
 SoA = Speed of Answer  
 TAP = Technology Access Program at Gallaudet University  
 TDM = Time Division Multiplexing, a method of handling electronic communications  
 TIA = Telecommunications Industry Association  
 TLPC = Samuelson-Glushko Technology Law & Policy Clinic  
 TRS – Telecommunications Relay Service  
 VRS – Video Relay Service

## Telecommunications Relay Services

### Reply Comments - In the Matter of Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities • Structure and Practice of the Video Relay Service Program • CG Dockets No. 03-123 and No. 10-51

■ (September 4) TDI, NAD, and CPADO submitted reply comments on the two topics in VRS:

#### a.) At-Home Interpreting on A Permanent Basis

Although the Consumer Groups generally support transitioning the pilot VRS at-home call handling program (the “Pilot Program”), some of the changes proposed by ZVRS/Purple raise concerns. ZVRS and Purple propose that the Commission should:

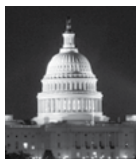
- Remove the three-year experience requirement for at-home CAs
- Eliminate the 30% limit on VRS minutes handled at home

- Require detailed six-month reports only from VRS providers newly providing at-home interpreting and
- Remove requirements for at-home-specific training and compliance certifications

Although Commenters are not aware that the Pilot Program negatively impacted call reliability and responses times, the Consumer Groups urge the Commission to maintain the higher standards for at-home interpreting and reporting requirements for all providers, not just (those) newly providing at-home interpreting when making the program permanent. Consumer Groups suggest that the Commission establish a timeframe to revisit the necessity of these heightened standards at a later date, potentially one to two years after making the program permanent.

#### b.) Enterprise and Public Videophone Log-In Procedures

The Consumer Groups continue to oppose any log-in requirements to use enterprise and public videophones as well as the proposed certification requirement for



# TDI In Action

September – November 2019

Continued from page 19

the responsible individual. Consumer Groups agree with Convo that the proposed log-in requirement risks rendering public videophones unusable to segments of the VRS user population that need public phones the most, including children, the elderly, ASL users traveling in the US from abroad, and those with cognitive disabilities. Consumer Groups oppose GlobalVRS's suggestion that visual verification of enterprise and public videophone users' identity is the most effective approach to preclude unauthorized usage. Visual verification raises similar heightened risks to consumer privacy with the additional risk of interpreters making snap judgment calls based on driver's license images. The Consumer Groups also continue to recommend that the Commission refer the issue to the iTRS Advisory Council to work with the TRS Fund Administrator on less burdensome ways to validate VRS calls from public and enterprise telephones. After the iTRS Advisory Council recommends a less burdensome way to validate such calls, Consumer Groups agree with GlobalVRS's suggestion that the Commission test, through a trial period, the impact of any log-in process on VRS users as well as the efficacy of the log-in process.

<https://ecfsapi.fcc.gov/file/1090498464690/Consumer%20Groups%20VRS%20Structure%20FNPRM%20Reply%20Comments.pdf>

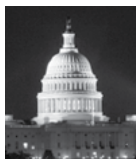
■ (October 15) TDI, HLAA, NAD, ALDA, CPADO, DSA, DHH-RERC, IT-RERC, and CCASDHH submitted reply comments on the request by Convo Communications, LLC for clarification of the Commission's rule prohibiting Video Relay Service providers from offering incentives to VRS users to register for or use the VRS providers' service. In its request, Convo asked the Commission to provide further guidance regarding the difference between VRS service related and non-service-related equipment as well as the circumstances under which giving away service-related equipment to induce users to port their VRS ten-digit telephone number is prohibited by the rule. Further clarifying the rule to be limited to such equipment, or outright banning equipment distribution, would deprive VRS users of functionally equivalent equipment to non-VRS users. Any restrictive guidance limiting equipment functionality to only VRS services would deprive VRS users of often helpful features and capabilities inherent to modern

consumer equipment with multi-function operating systems. Featured-limited or single purpose VRS equipment would in no way be functionally equivalent to the off-the-shelf equipment hearing users have access to. Further, VRS users are at a greater risk of being financially limited, unemployed, underemployed, and/or having support from some form of disability income. For the reasons stated above, the Consumer Groups and Accessibility Researchers oppose any clarification of the rule that disallows distribution of VRS equipment. Additionally, regarding classification of equipment being distributed by VRS providers including CSDVRS, LLC d/b/a ZVRS and Purple Communications, Inc., the Consumer Groups suggest the Commission refer the question to the iTRS Advisory Council. The iTRS Advisory Council would then make specific recommendations to the Commission for any necessary further action.

<https://ecfsapi.fcc.gov/file/1015547224712/Consumer%20Groups%20Reply%20Comments%20Convo%20VRS%20Petition%20for%20Clarification.pdf>

## Comments - In the Matter of Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities • Misuse of Internet Protocol (IP) Captioned Telephone Service • CG Dockets No. 03-123 and No. 13-24

■ (September 25) HLAA, TDI, NAD, ALDA, CPADO, AADB, DSA, DHH-RERC, IT-RERC, and NTID submitted comments in response to the Applications for Certification as Providers of ASR-based IP CTS and related filings of Clarity, VTCSecure, and MachineGenius. While the Consumer Groups generally support the efforts of the Commission and of the ASR applicants to investigate and develop the use of ASR as a means of improving the efficiency and sustainability of the IP CTS program, formally or tacitly waiving the existing mandatory minimum standards for CAs would effectively undercut the quality, privacy, and safety values that IP CTS consumers should have the right to depend on from all providers. Doing so would potentially set back efforts by the Commission, the IP CTS industry, and consumers to raise the bar for quality on a technology-neutral basis. Accordingly, we oppose certification because the applications do not



# TDI In Action

September – November 2019

Continued from page 20

provide sufficient information about quality, privacy, and 911 connectivity. Without additional information, the Commission, applicants, and consumers will be unable to analyze and weigh tradeoffs and harms that may arise if the services do not provide high quality outputs, safeguards for user privacy, or sufficient 911 connectivity. We urge the applicants to supplement and substantiate their claims in reply comments. We may change our view if applicants can demonstrate that their services will adequately protect consumers' rights to functionally equivalent communication. Toward that end, we have compiled a non-exhaustive list of proposed guiding questions, and seek non-conclusory statements supported by evidentiary findings.

<https://ecfsapi.fcc.gov/file/1092564956837/2019.09.25%20Consumer%20Groups%20and%20Researchers%20IP%20CTS%20ASR%20Application%20Comments%20Final.pdf>

**Ex Parte - In the Matter of Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities • Structure and Practice of the Video Relay Service Program • CG Dockets No. 03-123 and No. 10-51**

■ (November 20) On November 18, 2019, NAD, CPADO, and TDI met with Diane Burstein and Robert Aldrich of CGB; Eliot Greenwald, Michael Scott, and Debra Patkin of DRO; Andrew Multz and David Schmidt of OMD; and Virginia Metallo and Susan Lee of OEA. Mark Hill, President of CPADO, requested this ex parte meeting to express grave concerns with the lack of movement on the trial period of the provision of deaf interpreters in VRS. The Commission announced a voluntary eight-month trial and required the providers to declare their intention to participate in the trial by June 1, 2017. To date, none of the providers has elected to participate and this is due to the Commission's failure to increase the rates for compensation for these services. The Commission indicated that compensation for these specialized services would be the same as for any other VRS services. That decision disregards fundamental differences between such specialized services and general VRS services. Furthermore, providers will incur development and implementation costs for the trial since it will involve intensive IT changes, including but not limited to establishing a separate queue and managing

the transfer of calls. We are ... concerned that the trial will never launch in the absence of further Commission action to clarify that the providers will be able to receive increased compensation in exchange for the extensive undertaking to offer specialized services to meet the needs of the deaf users, including those with cerebral palsy, and ensure functional equivalency. Without VRS provider participants, there will be no data and without data, the permanent provision of these services will never become a reality. ... It is our position that it is necessary to provide additional compensation to the providers for the pilot program in order to launch the trial and gather the necessary cost data. We reminded the Commission that the Council's request is still pending despite it being filed more than two years ago. Trials for both skills-based routing and deaf interpreters should proceed without haste. For far too long have the cries of deaf consumers calling for advancement of the quality of VRS gone unheeded. Without these trials, deaf consumers have had to endure insufficient access to the necessary level of functionally equivalent calls. For the reasons stated in this letter, we urge the Commission to take decisive action and compensate both pilot programs at the emergent rate of \$5.29 per conversation minute.

[https://ecfsapi.fcc.gov/file/1120110202662/FINAL\\_Consumer%20Groups%20Ex%20Parte\\_Deaf%20Interpreter%20Pilot%20Program.pdf](https://ecfsapi.fcc.gov/file/1120110202662/FINAL_Consumer%20Groups%20Ex%20Parte_Deaf%20Interpreter%20Pilot%20Program.pdf)

## Closed Captioning

**Reply Comments Filing - Children's Television Programming Rules • Modernization of Media Regulation Initiative • MB Docket Nos. 18-202 and 17-105**

■ (October 15) TDI, HLAA, NAD, CPADO, ALDA, AADB, CCASDHH, ACB, AFB, IT-RERC, DHH-RERC, and NTID submitted reply comments on the Commission's Further Notice of Proposed Rulemaking in the above-referenced dockets. The FNPRM proposes to create a framework in which broadcasters could sponsor Core Programming on another station in the market to meet its children's programming requirements. We urge the Commission to again consider our concerns raised in our June 27, 2019 ex parte, addressed in footnote 188 of the FNPRM's associated Report and Order — namely, that we do not yet know all



# TDI In Action

## September – November 2019

Continued from page 21

the possible accessibility implications of modifications to the children's television rules. While the Report may have further implications for the accessibility of children's programming for children with visual and hearing disabilities. For example, Rule § 79.1(d)(12) exempts video programmers from providing closed captions if their annual gross revenue is less than \$3,000,000. Allowing broadcasters with revenues greater than \$3 million to sponsor stations making less than \$3 million could shift children's programming from stations that are required to caption it to stations that are exempt from the captioning rules, effectively expanding the reach of the categorical exemption beyond its existing bounds. Thus, the Commission must assess how any changes might create or exacerbate accessibility issues with children's programming.

It remains unclear from the FNPRM or the minimal record developed in response the extent to which special sponsorships might implicate the accessibility of children's television programming. Indeed, only two organizations commented:

- One Ministries, Inc. requested that commercial stations owned by non-profits also be allowed to benefit from sponsorship exemptions.
- America's Public Television Stations, The Corporation for Public Broadcasting, and the Public Broadcasting Service ("Public Broadcasters") argued that increased quality, accessibility, and availability of programming should be allowed to satisfy the requirements for sponsorship exemptions.

We agree with the Public Broadcasters that the Commission's sponsorship framework should increase the accessibility of children's programming. The accessibility and availability of children's educational content are paramount to the civil rights of children with visual and hearing disabilities. Therefore, the Commission should address our ongoing concern about the accessibility of children's programming in the same way it did in the Report and Order: by requiring the Media Bureau to also assess how any changes to the rules regarding special sponsorships might impact accessibility for children with visual or hearing disabilities when issuing a Public Notice seeking information from broadcasters and viewers.

<https://ecfsapi.fcc.gov/file/10152638625447/2019.10.15%20>

[Consumer%20Groups%20and%20Researchers%20Reply%20Comment%20final.pdf](#)

■ Joint Motion for Extension of Time - Closed Captioning of Internet Protocol-Delivered Video Programming: Implementation of the Twenty-First Century Communications and Video Accessibility Act of 2010 • MB Docket No. 11-154

■ (October 24) Pluto, Inc. and TDI submitted a joint motion asking the FCC to extend the public comment and reply comment deadlines regarding Pluto's request for temporary waiver of the Commission's IP closed captioning rules with respect to certain platforms upon which users can access Pluto TV's content. On July 22, 2019, the Media Bureau ("Bureau") found good cause to grant an initial motion for extension of time related to the Pluto Petition. However, Pluto, Inc. and TDI moved to extend the due dates again for comments and reply comments in this proceeding by an additional 120 days to February 21, 2020 and March 6, 2020, respectively. Both parties previously had discussed with the FCC the technological challenges encountered by Pluto as it has been investigating and implementing improvements to its closed captioning functionality. They have agreed that it is in the interest of consumers to continue investigating the root causes of the technological challenges faced, and collaborate on methods to prevent future technological issues from arising. They said that the extension of time will hopefully provide additional opportunity to address encountered issues and possibly reduce or eliminate the need for Pluto's Petition.

<https://ecfsapi.fcc.gov/file/102483248898/10-24-19%20Pluto%20TV%20Waiver%20Petition%20Extension.pdf>

**Reply Comments on the Petition for Declaratory Ruling and/or Rulemaking on Live Closed Captioning Quality Metrics and the Use of Automatic Speech Recognition Technologies - In the Matter of: Closed Captioning of Video Programming Telecommunications for the Deaf and Hard of Hearing, Inc. Petition for Rulemaking • CG Docket No. 05-231 • MB Docket No. RM-11065 • Docket No. RM-11848**

■ (October 30) TDI, NAD, HLAA, ALDA, CPADO, DSA, CCASDHH, DHH-RERC, Captioning DRRP, and





# TDI In Action

## September – November 2019

Continued from page 22

IT-RERC submitted reply comments on a petition by TDI and others for declaratory ruling and/or rulemaking on live closed captioning quality metrics and the use of automated speech recognition technologies. The petition under consideration in this proceeding contemplates two specific and straightforward requests: the long-term development and implementation of technology-neutral quality metrics for closed captioning of live video programming, and immediate guidance on the use of automatic speech recognition (ASR) under the Commission's quality standards and associated best practices. The record strongly supports the Commission taking action on both issues. Qualitative comments by hundreds of consumers in response to an HLAA survey, coupled with hundreds of consumer comments in response to the petition, demonstrate a wide variety of issues and concerns with caption quality for live programming. Nearly all consumer commenters expressed the need for improved live captioning quality. The record also indicates overwhelming support for implementation of technology-neutral metrics to better monitor the quality of captions. The best-practices approach does not provide a sufficient framework to hold the provision of captions to a standard sufficient for consumers who are deaf or hard of hearing to access video programming on equal terms. Moreover, consumers should no longer be forced to bear the unfair burden of reporting widespread problems with caption quality. The complaint processes through the Commission and the individual broadcast stations are a cumbersome and ineffective mechanism to monitor caption quality. Although shifting this onus to caption providers by creating more stringent and neutral metrics will take some time, it is nevertheless imperative for the Commission to begin this process. Further, the Commission should issue a declaratory rulemaking and/or expedited rule change to ensure that ASR techniques do not become more widely deployed without first providing a mechanism by which to gauge whether ASR techniques meet the Commission's current standards or best practices. The record raises the possibility that the use of ASR may be responsible in some cases for the decreased caption quality routinely observed by consumers. The Commission must address the deployment of ASR urgently to ensure that it develops with sufficient quality to serve the needs of consumers who are deaf or hard of hearing.

<https://ecfsapi.fcc.gov/file/10300821916482/2019.10.30%20>

*Live%20Caption%20Quality%20PFR%20Consumer%20Groups%20Reply%20Comments%20final.pdf*

## Miscellaneous

**Ex Parte Filing • Telecommunications for the Deaf and Hard of Hearing, Inc. • CG Docket Nos. 03-123, 05-231, 10-51, and 13-24 • PSHSB Docket Nos. 10-255 and 11-153**

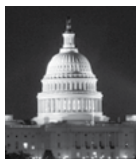
■ (September 26) TDI filed an ex parte on Executive Director Claude Stout's meeting on September 24, 2019 with Diane Burstein, Deputy Bureau Chief, Consumer and Governmental Affairs Bureau, Federal Communications Commission regarding the abovereferenced dockets. Mr. Stout reiterated with Ms. Burstein some points raised in recent years by TDI and other deaf and hard of hearing consumer groups on which we would appreciate timely action by the Commission as follows:

a.) Text-to-9-1-1. There is a critical need for accelerated deployment of text-to-911 service with over 6,000 PSAPs across the nation. Stout encouraged Ms. Burstein and DRO staff to meet regularly via interagency coordination with the Civil Rights section at the Department of Justice (DOJ). Five years after the order [requiring cellular carriers to carry texts to 911], we now have 30 percent participation from the PSAPs in America. This will have a significant effect on the success we aim to achieve with another new technology—RealTime Text (RTT).

b.) TRS Issues.

i.) Skills-based routing. TDI and its sister consumer groups have patiently waited for at least five years for the Commission to authorize skills-based routing trials for VRS. Stout (gave) several examples of how this would significantly benefit the community, including phone contacts with lawyers, financial advisors, and doctors and nurses.

ii.) ASR-Based IP CTS Offerings. TDI and its sister consumer groups have asked the Commission to develop a framework to more thoroughly evaluate applications to provide Automatic Speech Recognition (ASR)-based IP-CTS service. For the IP CTS experience to be functionally equivalent to telephone service, the Commission must create rigorous mandatory minimum standards for quality, privacy and 911 connectivity. In its



# TDI In Action

## September – November 2019

Continued from page 23

previous term, the Disability Advisory Committee gave the Commission a recommendation two years for a set of metrics for IPCTS. At a bare minimum, the Commission should apply the existing human-centric CA requirements to the ASR providers.

iii.) TRS Program Management. While the Commission has done commendable work managing the Telecommunications Relay Service (TRS) Fund, TDI and others have consistently asked that new technology improvements for any form of TRS service be encouraged regardless of the costs involved or the impact on the TRS Fund. To comply with Section 225, the Commission's primary focus must be on the benefits for the calling experience between those who are deaf and hard of hearing and their hearing contacts.

c.) Live TV Captioning. Stout expressed appreciation for the Commission for sending out a public notice on the recent petition from TDI and other consumer groups for declaratory ruling and/or rulemaking on Live Closed Captioning Quality Metrics and the Use of Automatic Speech Recognition (ASR) Technologies. In this petition, we urged the Commission to address near-term issues with the use of ASR by immediately issuing a declaratory ruling and/or expedited rule change with near-term guidance and policy on the application of the existing best practices to ASR. Stout underscored the importance of the Disability Advisory Committee working in sync, and avoiding working at cross purposes, with the Commission's development of a public record on this petition and ultimate development of caption quality metrics.

<https://ecfsapi.fcc.gov/file/1092686417788/ex%20parte%20letter%20to%20the%20FCC%20on%20Claude%20Stout's%20meeting%20with%20Ms.%20Diane%20Burstein%2C%20CGB%20Bureau%20Deputy%20Chief%2C%20FCC%2C%20on%20September%2024%2C%202019%2C%20September%2026%2C%202019%20final.pdf>

**Comments - In the Matter of Commission's Policies and Practices to Ensure Compliance with Section 504 of the Rehabilitation Act of 1973 • Structure and Practices of the Video Relay Service Program • Telecommunications Relay Services and Speech-to-Speech Services for Individuals**

**with Hearing and Speech Disabilities • Implementation of the Twenty-First Century Communications and Video Accessibility Act of 2010, Relay Services for Deaf-Blind Individuals • CG Dockets Nos. 10-162, 03-123, 10-51, and 10-210**

■ (October 21) TDI, NAD, ALDA, CPADO, AADB, HLAA, DSA, DHH-RERC, IT-RERC, and NTID submitted comments in response to the Federal Communications Commission's request for input on the Commission's policies and practices to ensure compliance with Section 504 of the Rehabilitation Act of 1973. The Consumer Groups recognize and applaud the Federal Communications Commission for its strength in operating the agency in an accessible way and setting policies that foster disability access. The Consumer Groups particularly highlight successes such as the participation of the deaf and hard of hearing community in the Disability Advisory Committee, the agency's engagement of the community on relevant agency proceedings, and the agency's maintenance of a fully staffed and active Disability Rights Office. While recognizing this important progress, the Consumer Groups advocate for further steps that can improve disability access. First, the Consumer Groups advocate for improvements to two particular programs: the National TRS Program and the National Deaf Blind Equipment Distribution Program. The Commission should consider the benefits of the National TRS program — and not just the cost — in making decisions. This will allow the program to achieve its stated goals, improve the lives of the disabled and potentially lead to cost-savings in the long term. The Commission should also form an advisory group for the National Deaf Blind Equipment Distribution Program (NDBEDP) that consists of consumer advocates and service professionals that review the equipment and resources that are offered through the NDBEDP. This will ensure that the community has access to state-of-the-art communication technologies. Second, the Commission should conduct more outreach to persons with disabilities to educate them about the tools available to facilitate interaction with the Commission. Lastly, the Commission should improve the outreach to persons with disabilities about proceedings that directly affect them and their community. <https://ecfsapi.fcc.gov/file/102253199397/Consumer%20Groups%20TDI%20et%20al.%20Comments%20on%20Section%20504%20Policies.pdf>



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