



WORLD

Technology News and Commentary for Deaf and Hard of Hearing People



PASSING THE TORCH TO A NEW GENERATION

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Telecommunications for the Deaf and Hard of Hearing, Inc. (TDI)
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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+.”

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Editor-in-Chief: Claude Stout

Managing Editor: Eric Kaika

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TDI BOARD OF DIRECTORS

NORTHEAST REGION

Cassandra Boryslawskyj, Treasurer
Cm.Boryslawskyj@tdiforaccess.org

SOUTHEAST REGION

Jan Withers, President
Jan.Withers@tdiforaccess.org

MIDWEST REGION

John Kinstler, Vice President
jkinstler@tdiforaccess.org

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Mark Seeger, Secretary
mseeger@tdiforaccess.org

WEST REGION

James House
JHouse@TDIforAccess.org

MEMBERS-AT-LARGE

Tina Childress
tchildress@tdiforaccess.org

Mei Kennedy
mkennedy@tdiforaccess.org

Matt Myrick
mmyrick@tdiforaccess.org

Opeoluwa Sotonwa
osotonwa@tdiforaccess.org

TDI OFFICE STAFF

EXECUTIVE DIRECTOR

Claude Stout
Executive.Director@TDIforAccess.org

PUBLIC RELATIONS DIRECTOR

Eric Kaika
PubRel@TDIforAccess.org

BUSINESS MANAGER

Terry Berrigan
Finance@TDIforAccess.org

TDI

940 Thayer Ave #8009
Silver Spring, Maryland 20910
www.TDIforAccess.org

TELEPHONE:

Phone (Voice/Video): 301-563-9112

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send an email to

PubRel@TDIforAccess.org

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Shaping An Accessible World

Board Views



JAN WITHERS

*TDI President and Board Member,
Southwest Region*

“TDI is very fortunate in that a strong foundation has been laid, from which exciting new ventures are poised to take off.”

Change is Good!

When Claude Stout first joined TDI in 1997 as its Executive Director, video communications and wireless technology were still in their infancy; captioning was not widespread; Sidekick and BlackBerry were not yet on the market; the first social media site, ‘Six Degrees,’ began that year; YouTube would not be launched for another eight years; self-driving automobiles, and the Internet of Things were mere concepts.

When one really thinks about it, it is staggering how much Claude has had to be on his toes to ensure that in the midst of all these rapid, even revolutionary innovations in hardware, software and services, the communication needs of Deaf, Hard of Hearing, DeafBlind, and Deaf Plus people are not overlooked. Early on, Claude recognized that in order to be able to keep up, he would need a strong and dynamic network of partners in consumer advocacy, academia, government, and industry.

He has in the past 23 years built such a network. Following are just a few examples of this now vast network: the four legal entities providing countless hours of pro bono legal services, Rehabilitation Engineering Research Center (RERC) Programs, the Disability Rights Office at the Federal Communications Commission, executives at various national and international corporations, and the Deaf and Hard of Hearing Consumer Advocacy Network (DHHCAN). It is due to this network that the United State of America is viewed by the world’s Deaf and Hard of Hearing population as a model for accessibility in telecommunications, media, and information technology.

Although Claude was responsible for many other aspects of TDI such as managing TDI’s operations,

coordinating the biennial TDI Conference, publishing the Blue Book and TDI World magazine, overseeing special programs such as Community Emergency Preparedness Information Network (CEPIN), working closely with the TDI Board of Directors, and so on and so forth, the building and nurturing of the network of partners probably was his most important job because it not only is key to TDI’s successes but also provides the foundation for TDI’s continued work following Claude’s retirement in June 2020.

We are excited to have Eric Kaika on board as TDI’s new Chief Executive Officer. Representing a new generation that essentially grew up with computers, Eric brings to TDI a deep knowledge of the various cutting-edge technological, administrative, and managerial resources available to support TDI’s operational, programmatic, and communications requirements as a virtual office. Eric joined TDI in 2016 and was serving as its Director of Public Relations when he was hired as its CEO. Prior to becoming CEO, Eric had proven himself to be an innovative thinker constantly seeking ways to strengthen TDI’s capacity to fulfill its mission. He also played critical roles in supporting TDI’s Board of Directors and Claude on policy matters in Washington, DC, such as serving as DHHCAN’s Vice Chair and representing TDI at the FCC.

Thanks to the combination of Claude’s foresight and Eric’s prior experience with TDI and despite the advent of the COVID-19 pandemic, the transition has been smooth. There was a two-month period of overlap when Claude was able to fully orient Eric to the role and responsibilities of CEO and to

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formally introduce him to the network of partners that has been and will continue to be key to TDI's success.

TDI now has a new generation of technological innovations and accessibility challenges, some of which Claude probably had never anticipated back in 1997. Video communications, smartphones; and other mobile devices are ubiquitous, captioning routinely on TV and the internet, virtual ways of living, working and shopping accelerated due to the pandemic and expected to be commonplace, self-driving automobiles soon to become a familiar sight on roads, the Internet of Things now widely available, even with

personal assistants ("Alexa, what is the weather today?"), and avatars being explored as a solution to the shortage of sign language interpreters. It is a brave new world, indeed.

Fear not! With Eric's expertise and vision and TDI's network of partners, we anticipate a more robust capacity to fulfill TDI's mission as well as exciting new ventures. TDI's Training Institute is only one example of such a venture. TDI has seen many changes since its inception in 1968 when it was founded to distribute and install TTYs and train individuals and businesses on how to use them. And it has seen even more changes since 1997 when Claude joined TDI and there is no

doubt whatsoever that Eric will see at least as many changes during his tenure as CEO. These changes have been and will continue to be good, but they would not be possible without the passion, commitment, and talent of such key players as Claude and Eric as well as TDI's partners.

Thank you, Claude, for all you have done and it has been an enormous pleasure working with you. All the best to you in your retirement! Welcome, Eric! We are excited to work with you in shaping an accessible world for all.



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Capitol Commentary



BY CLAUDE STOUT
TDI Executive Director

“Access isn’t as simple as it seems. It has evolved over the years to be more than accommodations.”

With Deepest Gratitude, I Bid You Farewell!

I will be retiring from TDI on June 19. It will be a bittersweet moment for me. I am truly excited for what the near future holds for me in retirement after I turn over the duties and responsibilities to Eric Kaika, the new TDI Chief Executive Officer. I look forward to catching up on enjoying life and its opportunities with the remaining time that God grants for me and Judy. On the other hand, it is sad for me as I will greatly miss working with special people at TDI, and from sister consumer groups, academia, industry, and government. Upon their retirement from illustrious careers in professional sports, Michael Jordan and Lou Gehrig said that they were the luckiest to have lived on earth and to enjoy their time in sports. I do feel the same way, and I thank you immensely to be of service to TDI in national consumer advocacy.

In the last 23 years (coincidentally Jordan’s jersey number) TDI and its sister consumer groups and academia have made over 1300 public policy filings with the Federal Communications Commission, thanks to the pro bono legal services (via over a total of over 60 dedicated professionals from four entities), which we were most fortunate to have. We have made significant progress for our access needs in areas of TV captioning, movies with captions at area theatres, telecommunications relay services, broadband access, emergency communications, access to the Internet, video communications, wireless indoor location accuracy, additional support for those who are deafblind or have a second disability like mobility, gaming systems and Virtual Reality, and advanced communication services, etc.

We hosted 12 Biennial Conferences in alternate sites across the nation, with the last several within the metro

Washington-Baltimore area. Roughly, we raised nearly a total of 23 (a familiar number!) million dollars in pro-bono legal services, donations, advertisements, and membership fees to maintain our daily operations. We celebrated two historical milestones with evening galas - TDI’s 30th Anniversary in December 1998, and the Golden (50th) Anniversary in October 2018.

I have truly enjoyed working with four different TDI Board Presidents (Lori Breslow, Dr. Roy Miller, Sheila Conlon-Mentkowski, and now Jan Withers). We were fortunate to have 34 distinguished individuals (including the Board Presidents) that have volunteered their time to serve on the TDI Board of Directors. I thank the Board members - current and past, for granting me the special privilege (and with as much time) to work for TDI, and to guide/support me and the staff to carry out the members’ mandates for equal access in telecommunications, media, and information technology. Relations between the Board and staff have been very supportive, fully-transparent, and accountable. We have had over 40 individuals that were full-time staff members, contractors, and volunteers at TDI. I thank them immensely for their contributions and expertise with TDI’s programs and services.

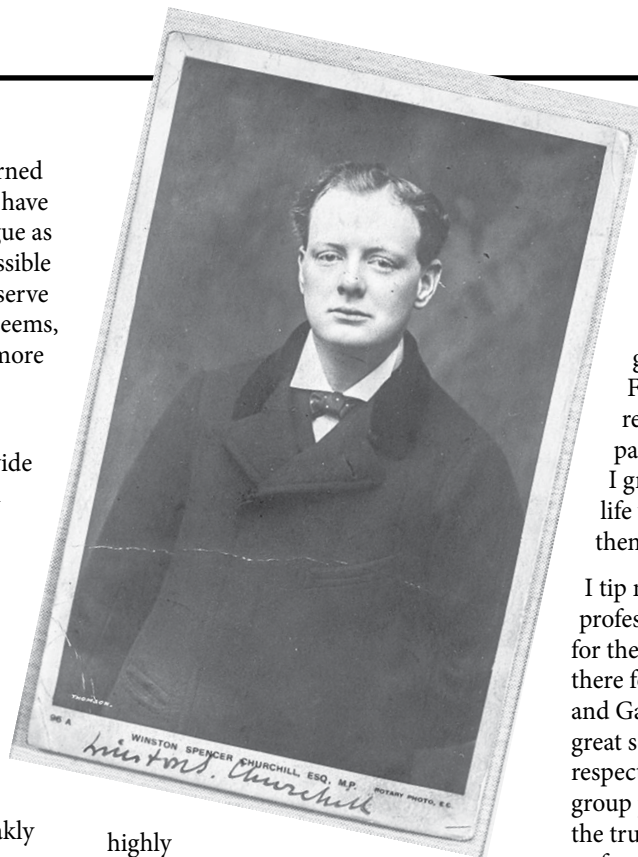
To our partners in national consumer advocacy and academia, government and industry, I thank you very much for your incredible, productive work with us at TDI. These distinguished stakeholders have been very supportive with input on a wide range of topics which we filed comments on with the FCC, and the initiatives in the marketplace and other areas in the community that support access for our deaf and hard of hearing

CAPITOL COMMENTARY Continued from page 4

constituents. In the process, we learned a lot from each other. Together, we have come to value maintaining a dialogue as well as making compromises as possible on policy issues that have come to serve us well. Access isn't as simple as it seems, it has evolved over the years to be more than accommodations.

There will always be an unlimited number of ways and means to provide access. With as much collaboration between industry and consumer groups/academia, we stand to generate much progress with minimal intervention possible from the government. When all fails, we can then ask the government to resort with new rules. Winston S. Churchill said it best, "Dynamite in the hands of a child is not more dangerous than a strong policy weakly carried out." Churchill, just three years short from becoming a Member of Parliament (MP), was 23 years old (again, another familiar number) when he expressed this view on Great Britain's policy on Afghanistan in 1897. This is a good adage to consider as we seek to applying disability access to the benefit of all.

Hands down, the FCC has been the best federal agency with meaningful and gainful results for people with disabilities, including us who are deaf and hard of hearing. No other federal agency has kept such a total commitment to be fully transparent/inclusive with its input-gathering system for public policy filings and a Disability Advisory Committee. During the year 2009, in recognition and appreciation for the FCC's outstanding contributions with its regulatory and enforcement activities for the disability and business communities, TDI and its sister consumer groups presented a framed artwork to the FCC for its 75th Anniversary. We commissioned a deaf artist, Mr. Chuck Baird, to create this



highly symbolic gift.

It came with real brushes that were positioned together as a U.S. flag in red, white, and blue paint colors. When you go visit the FCC, you will find it on display with its other awards and gifts on the first floor near the Commission meeting room. In the last thirty years, the FCC has painted a brighter, more accessible future for us in America with its regulatory actions. Thank you, thank you very much, the Commission.

I want to express my deepest appreciation to Judy, my dear wife - for her unconditional love and support for 47 years. We met in 1973 at NCSD, Morganton, NC while we were taking a typing class, using IBM Selectric typewriters. She has been the number one reason that my 23 years' time at TDI was a labor of love.

Judy and I are truly blessed to have two children, a daughter Abby, and a son Ty. They are our pride and joy. When he accepted his Oscar recently, Brad Pitt said his kids color everything he does. Judy and I find this true with our family.

They have been most willing to share their parents with a second family - TDI and the national deaf and hard of hearing community. Judy and I look forward to spending more time with them, their spouses - Katie and Emily, and our four grandchildren, Landon, Logan, Frankie, and Miles. It would be remiss if I didn't mention my parents - Arvie and Ethelene Stout. I grew up as a kid having a normal life with much love and support from them.

I tip my hat to students, alumni, and professionals at North Carolina School for the Deaf, Morganton, NC (studied there for a wonderful fourteen years) and Gallaudet University (also, another great seven years) for instilling in us the respect for, and importance of having group processes to build on/maintain the true, hard-earned values they taught us from the norms, culture, and beliefs to achieve our current standing in today's society. The same goes for my previous employment with Gallaudet, National Association of the Deaf, Missouri Commission for the Deaf and Hard of Hearing, and N.C. Division of Services for the Deaf and Hard of Hearing.

When John F. Kennedy gave the inaugural address in 1961 as the new President of the U.S., he said "the torch has been passed to a new generation." Let us extend our best wishes to the new Chief Executive Officer of TDI, Eric Kaika. He will have our total, unequivocal support, and with it, he will move TDI forward to new heights of success.

In closing, permit me to say again, thank you, thank you very much. May you and your families stay safe and well as we recover from the COVID-19 pandemic. I bid you farewell. God bless TDI, the national deaf and hard of hearing community, and our dear America.

Interview with Claude Stout, the Retiring Executive Director, TDI



Brief background before joining TDI? And what prompted you to join TDI?

I applied for the TDI Executive Director position during fall

1996. That was when I was Assistant Director for Community Affairs with NC Division of Services for the Deaf and Hard of Hearing. I served there for five years. Before that, I was Executive Director with Missouri Commission for the Deaf and Hard of Hearing for two years, and Assistant Executive Director for Business Services with National Association of the Deaf for ten years. When the TDI position vacancy was made public, I thought it would be a good opportunity to fully engage in public policy development at the national level. Having had seven years in community outreach and public policy implementation in Missouri and North Carolina got me ready for the TDI position.

Favorite memory with TDI?

I have to say two things, as they are tied as my favorites. One is working with four different pro bono legal teams to produce over 1,300 joint documents from TDI and its sister consumer groups and academia, for filing with the Federal Communications Commission. We gave input to the Commission on a wide range of topics like relay services, emergency communication, gaming systems, broadband access, etc. And the second is producing a highly successful

celebration of TDI's 50th Anniversary with an evening gala, attended by close to 500 people, a 37-minute documentary video on TDI's service and contributions to America during its first 50 years, and a 152-page special TDI World commemorative edition on these accomplishments.

Proudest/biggest accomplishment in your 23 years with TDI?

Developing good relationships with partners in government, industry, and consumer advocacy. Otherwise, we would not accomplish as many (over 1,300) joint filings with the Commission, and see the FCC produce a large number of regulatory initiatives to support/upgrade our access in TV captioning, emergency communication/notification, device connectivity, and relay services, etc.

What was your biggest challenge/hardest part of your job over the years?

Passing on our success at national level in public policy development to effective knowledge/understanding and application of access rules/regulations at state/local levels. This will be further addressed when we have the Training Institute fully up and running.

What will you miss the most about TDI?

Working with highly capable, and well-committed professionals at TDI, and in government, industry, and consumer advocacy. We didn't do the work alone, we have been most fortunate to work with this network of stakeholders, who identify with TDI's mission, vision, and goals. Together, everyone achieves more (TEAM).

Looking back at your career, knowing what you know now, is there anything you would do differently?

Yes, if we had more pro-bono legal support, we would have done more with US Department of Justice, US Department of Transportation, US Department of Homeland Security, and a number of other federal agencies. We could have partnered some with the National Governors Association and the League of Cities. However, I am excited with the new plans/vision that the TDI Board and Eric Kaika, the new Chief Executive Officer have in mind for the near future, etc.

What is the biggest challenge TDI faces in the future, and how prepared is TDI to meet that challenge?

To offer our programs and services online. Eric will do a great job making this happen from our recently revamped website, www.tdiforaccess.org, and especially with the activities of the new Training Institute. This is more critical as we are recovering from the COVID-19 pandemic and to function in a "new normal."

Why did the position change from Executive Director to CEO?

Our work has increased five-fold from when I started in 1997. Back then, we didn't have any pro bono legal services. The number of filings with the FCC grew from a small number like three to five per year in the late 1990/s, to an average of 50 to 75 a year in the 2020's. We coordinate our work with our sister

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Our Quest for Access



BY ERIC KAIKA
Managing Editor

**“It is truly an honor
to be selected as
the chief executive
officer succeeding
Claude.”**

Big Shoes to Fill, the Honor is Great

This is a surreal column to write. Never did I think, when starting this column two years ago, that I would be writing for the column on the previous page, Claude’s featured column “Capitol Commentary”.

It is truly an honor to be selected as the chief executive officer succeeding Claude. I am humbled to assume the mantle of leadership in support of TDI’s mission. I would like to thank Claude and his 23 years of distinguished service and leadership. I am determined to build on TDI’s past successes by amplifying its contributions to the deaf and hard of hearing community.

I would also like to thank the TDI Board of Directors for their belief and trust in me to assume the responsibility for TDI. I look forward to working closely with the board, members of TDI and the deaf and hard of hearing community, and the accessibility players in industry and government accessibility players.

And most importantly, I want to thank my family and friends for their encouragement, teachings, and love. Especially my wife, Karry, and daughter Ria. Everyday I am blessed to be in their lives, and as I navigate through this new chapter in my life their unwavering support acts as my

guiding star.

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.

While I work on transitioning into this position, I am also carefully framing a vision plan that I intend to share with all of you in TDI World volume 51, issue 4 -- the last issue of 2020. In that issue I will share more about the new paths we will explore and avenues we’ll travel together.

Between now and then, it’ll be a challenging time for all of us. With the pandemic alongside the current political climate, this feels like a baptism by fire experience. Yet know this, in 2021 we will continue to see TDI put forth great things for the community. Thank you all for your continued support for TDI.



Interview with Eric Kaika, the New Chief Executive Officer, TDI



Congratulations on the appointment by the TDI Board as the new Chief Executive Officer! When you were interviewed for

the position, the search committee probably asked you the first question here -why did you apply for the position?

EK: In my nearly four years with TDI, I learned a lot about what TDI truly does in the policy arena. TDI is more than just the Blue Book and a “telecommunication advocacy organization”. It has done a tremendous amount of work for the deaf and hard of hearing communities, not just in telecommunications, but captioning, internet videos, emergency communications, real-time text, advanced communications services, and more.

It is inspiring to see the work that TDI does for the community, and as a long time employee of various nonprofit organizations, I found TDI to be an exceptional organization with a long history of promoting equal access for deaf and hard of hearing people through public policy.

And as someone who has always worked for nonprofit organizations, I found TDI to be an organization worth giving it my all because it has great potential in shaping the future of deaf and hard of hearing Americans.

What has prepared you well for the new position?

EK: First and foremost, I draw on my 10+ years in the nonprofit sector. After graduating with a degree in government, I immediately started working for CSD, an established communication organization that provides a wealth of resources for the deaf and hard of hearing community. After several years there, I moved to Aspen, Colorado to work as an Operations Director for a

deaf and hard of hearing camp. After that I moved back east to run my own business. My career experience has given me a wide range of skills, from marketing to sales to operations to management and fiscal responsibility.

Secondly, and perhaps most importantly is my upbringing in the deaf and hard of hearing community. My father was an Alumni Director and Public Relations Director at Gallaudet University for around 30 years. Throughout his time at the Alumni House, I would always hang out there after school, watching and working with so many dedicated volunteers to the community. I was extremely fortunate to meet people like Alan B. Crammatte (ABC) and his wife, David and Polly Peikoff, and Don and Agnes Padden among others who would come in almost daily, volunteering their time at Alumni House. Not to mention the numerous TTY-a-thons, calling the alumni for contributions, doing data-entry in the computers, and the social parties upstairs. Even just walking across the campus and hitching rides with the facilities crew. All these interactions growing up shaped my value and belief in giving back to the very community that raised me.

And finally, my parents, my family, and their friends. My father is late deafened, so he speaks well but can't hear a thing. My mother is hard of hearing and could also speak well. When I was nine years old, she became stricken with a type of encephalopathy and lost a lot of her motor skills, requiring my father, sister and I to care for her. And during my upbringing we'd often get together with Art Roehrig, a DeafBlind activist. So for my entire life, I've been in situations where I experience first-hand the barriers that not only deaf people face, but late-deafened adults as well, and the restrictive environment imposed on deaf people with mobility challenges.

Those are the very issues TDI tries to deconstruct through policy. The very same issues that impact me to the core of who I am. This is why I want to be here

at TDI, not only to lead the organization, but to effectively make the world a liberating place for all people who are deaf and hard of hearing.

What public policy issues do you anticipate working on in the next one year, three years from now, and five years from now?

EK: One issue that I've recently gotten involved with and would really like to see gain traction is raising the VRS industry's accessibility offerings, like having deaf interpreters and specialized certified interpreters in the VRS environment, in addition to a deafblind relay service. I'm the first to say that the current Video Relay Service industry is operating well, and greatly benefits many sign language users, however there are still other sign language users that cannot fully benefit from basic video relay services.

A deafblind person can tell the relay interpreter what to say, but how would s/he confidently know what the interpreter is saying. Deafblind people require additional accessibility equipment that is not covered by the FCC, nor provided by the VRS companies. The National Deaf Blind Equipment Distribution Program is another excellent organization, but they have their own issues, especially when they are, undeniably, being left out of the telecommunications sector.

The deaf interpreter and specialized certified interpreter (also known as skills based routing in the industry) would help in several ways applicable to those who may have restricted mobility with their arms -- people like my mother, or those with cerebral palsy. And for the skills based routing for times when we need to call our doctors and lawyers, we should be able to summon an interpreter that has the specialized training to effectively facilitate the call.

Another relevant issue is automatic speech recognition (ASR). This is a wonderful piece of technology that has

KAIKA INTERVIEW Continued from page 8

the potential to support the extreme shortage of captioners. Currently the captioning industry, as well as providers of captioned telephone relay service (CTS / IP-CTS) are facing a staffing shortage to meet the heavy demand for captioning. I do believe at some point ASR may be able to effectively replace that workforce, but until then -- there must be standards for ASR.

There needs to be policy in place that guides us when it is appropriate to use ASR and when it is not. Personally, I am not comfortable with using ASR in emergency situations, like when calling 9-1-1 or when the news is reporting on a natural disaster that is affecting our residential areas.

We must be assured that ASR is head-to-head with live captioning in areas of accuracy and speed. There must be technology-neutral minimum standards in place before we go outfitting everything with ASR.

Real-Time Text is another issue I would like to focus on. Although this technology is already out there and exists in every smartphone, it is not yet a household name. I want to see RTT fully implemented across all carriers (currently not supported by non-tier 1 carriers).

RTT can be a valuable life-saving tool. It allows for direct connection with emergency 9-1-1 centers. It can be useful in situations where speaking can cause more harm than good. And because RTT runs on the voice line (not data), it can be advantageous in rural areas where our cellular data plan is out of range.

So while there is still some policy work left with RTT, it's mostly going to become a public relation campaign to build up awareness and get people using RTT. And the best analogy I can give about RTT is that it is essentially a 21st century TTY. The GA/SK functionality lives on!

What new initiatives do you hope to produce for TDI as an organization,

building on the success from its proud 52-year history of service and contributions to the national deaf and hard of hearing community?

EK: I have several ideas that I'll touch on without going into detail, such as lowering the individual consumer membership rate and slowly shifting to a professional type membership organization -- while still very much interacting with consumers via media, surveys, Blue Book, etc. I'd like to expand on the Training Institute concept by building an online video platform rather than keeping the focus on an in-person event type of thing. I think this approach gives people the opportunity to learn on-demand and have training materials available at their disposal 24/7, instead of taking home paper and relying on their notes and memory. I would like to see TDI do more public engagements, marketing and dissemination, reaching out to all the generations in the community (boomers, XYZ and millennials) and getting them to fully understand TDI's role. By working more closely with the entire community, I believe we'll be in a much better position to influence policy because we'll have more hard data rather than anecdotal evidence.

What are the exciting possibilities you foresee TDI addressing in the next few years?

EK: The way I've been looking at it is, the first 25 years of TDI's existence has mostly been focused on the telecommunications aspect - TTYs, 711 Relay, and alternative relay (CTS, VRS, etc). Then from the mid 90's to 2010, we started doing more Media work (captioning, advanced communications, CVAA, ASR, etc). And while we're still working on those two fronts, the biggest explosion is coming from the Information Technology side.

I believe TDI will become increasingly busy in that sector with things like smart cities, automated vehicles, artificial intelligence, extended reality (augmented, mixed, and virtual),

internet of things, and much more. TDI will continue to be involved in all these areas in making sure that whatever products and services come out of those sectors are fully accessible to people who are deaf, hard of hearing, deafblind, late-deafened, and deaf+ (those with additional disabilities).

One other idea was inspired by the TDI 50th Anniversary Gala in 2018 -- when we had several deaf students from Gallaudet University that attended. Suddenly we had a room of 500+ leaders, activists, and contributors from all ages, generations, and backgrounds -- all a part of the deaf and hard of hearing community. I realized then we need a better pipeline that allows our youth to directly interact with those who are preparing to "hand down the torch". Essentially, I'd like to have more galas, to recognize both: the up and comers in accessibility along with those that have blazed the way.

What are the challenges you anticipate TDI to address in the next 12 months, three years from now, etc. in light of the COVID-19 pandemic?

EK: No doubt it's going to be virtual meeting rooms like Zoom, Google Meet, and Microsoft Teams to name a few, and the growing number of webinars. I think we'll be encountering some basic accessibility issues that were not thought of during the design phase, and then there are some that may be out of the hands of these companies.

For instance, it is mind-blowing to me that as a deaf / hard of hearing participant in a virtual meeting room, that I have to have two monitors to effectively communicate in an online discussion with multiple hearing people. The situation I am describing is when we are in a virtual meeting, as a guest / observer - like watching a webinar, or other online presentations hosted by an external companies. Sometimes we'll get lucky and they provide an interpreter or captioning, but most of the time it doesn't work that way and we end up

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having to use VRS/CTS (on the 2nd monitor) to call-in the meetings's audio bridge, while we watch the presentation on the other screen.

If there are several people using relay, suddenly we're using multiple relay providers to make one call. In my opinion, that is wasteful spending of the Telecommunications Relay Service fund. It would be a lot easier if the platforms allowed video relay providers to directly connect with those virtual rooms so all the participants can benefit. This issue is more of a "who has jurisdiction?" The FCC? The virtual platforms? Modification of relay platforms? I look forward to tackling this issue.

Another part is the issue of COVID infecting our hard-working and talented relay interpreters and captionists. Historically, these people would work in one facility -- several dozen cubicles and they would rotate shifts, using the same cubicle. Clearly this is a high risk environment for acquiring the Coronavirus. Fortunately, the FCC acted quickly and allowed these valued employees to work from home.

But what about the next pandemic? Or what if this workforce becomes more and more under pressure and unable to successfully handle the call-flow? I just can't shake the feeling that this part of the relay service is still vulnerable to external factors.

What I would like to see, and what I believe is a fully functional equivalent, is a direct connect type of service. The FCC already has their ASL Consumer Support Line for several years now, Comcast has their own ASL Now platform for over a year now, Google also started their ASL support earlier this year.

This is where sign language users can directly connect with government agencies and industry companies to communicate in sign language -- without the need of a middleman (interpreter) to facilitate the conversation.

I think the FCC should claim ownership

of this type of communication access, and provide some type of oversight and certification for this service, similar to how they certify relay providers and automated speech technology in the captioned telephone service. I can imagine this would also reduce the TRS budget as well.

Who are your role models in community leadership and nonprofit administration? What have you learned from them, that you will try to emulate when taking over TDI officially on June 1?

EK: In the area of community leadership, I am inspired by my wife, Karry Takeuchi and the Japanese deaf community. They put community first, and are always mindful of others. Americans are typically a little more on the individualistic side. I'm not saying one is better than the other, just that there's a real sense of community ownership and involvement in the East compared to here.

The obvious answer would also be to name established leaders like Andrew Foster, Greg Hlibok, Dr. I King Jordan, Dr. Glenn Anderson, Al Sonnenstrahl and Phil Bravin as examples - and I know there are many others that belong in that same category. They have all blazed a trail for the rest of us to follow. But I must also include those that are out there on the front lines giving it their all and trying to change the world. People like Christine Sun Kim, Leah Katz-Hernandez, and Rikki Poynter, to name a few.

For me, leadership is really about working with a diverse group ranging across the entire hearing loss spectrum and cohesively moving towards creating an accessible world for all.

We can see that you will continue to build on the recent efforts in the last few months with the revamped, new-look TDI website. A job well done! How will you improve spreading the good word about TDI's national consumer advocacy efforts on the new website and via social media?

EK: This is an area where I'd really like to tap into our younger colleagues. I've thought about working with career centers at Gallaudet and RIT to get interns and help TDI amplify its voice to the community.

I want to move away from the traditional "written word" and more towards all-inclusive video. TDI has traditionally relied on print media, and while there's nothing wrong with that, I feel it does -- unintentionally -- disenfranchise a percent of the population that may have issues with accessibility when it comes to printed materials.

So I would like to experiment more with creating high quality videos that have sign language, voice-over, captioning, and accompanied with a descriptive transcript.

TDI has continued to excel well in collaborative activities with government, industry, academia, and other sister consumer groups. Will there be new approaches you take to foster such team-building efforts?

EK: TDI has always excelled in collaborating with the government, industry, academia, and other consumer advocacy groups. I think this is one area that is rock solid and doesn't have many areas to improve on. I'm likely to continue the great work you did here, and if any changes happen they're liable to be minimal.

You are the Vice Chair of Deaf and Hard of Hearing Consumer Advocacy Network. Can you briefly describe what this coalition does for the national deaf and hard of hearing community? What would you like to see the coalition accomplish in the next 12 months? Three years from now?

EK: DHHCAN is an invaluable coalition that meets the first Wednesday of every month, bringing together over 15 consumer advocacy organizations and partners like American Association for the DeafBlind (AADB), Deaf Seniors of America (DSA), Hearing Loss Association of America (HLAA),

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National Association of the Deaf (NAD), and TDI.

The coalition largely focuses on seven key policy issues:

- Civil Rights Protection and Enforcement;
- Education;
- Employment;
- Health Care;
- Housing;
- Telecommunications, Information Services, and Video Programming, and
- Transportation

We get together for about two hours that day and share our progress, issues on the horizon, policy progress and such. DHHCAN Is a great place to start when wondering about what's next for the deaf and hard of hearing community. What I'd love to see are more d/hh organizations joining as members. While the seven policy issues cover a lot, there are still many other issues out there that we, as a deaf and hard of hearing community, need to be watching and it would greatly be beneficial to everyone to have more d/hh organizations working together. We need more organizations representing other areas of the deaf and hard of hearing community especially in racial diversity.

As for future accomplishments, I would definitely love to see the federal Executive and Legislative branches act on at least half of our policy recommendations that we put forth every election year. This is a 20-some page document covering many many accessibility issues. It can be found under "Policy Proposals" on the DHHCAN.org website.

If you are asking our community to consider joining TDI as a new member, or to renew it with TDI, what would be your message to them?

EK: Don't get complacent with what we have today. In just 50 years, the deaf and hard of hearing community went from relying on their parents and neighbors to make phone calls for them, to the TTY, to phone relay and now having video and captioning relay. But it took hundreds of years to arrive at this point. And we would be remiss to think everything is good now and there's little else to do.

The truth is there is a lot more we should be fighting for, if not better relay services, then direct access. And despite all this incredible technological process, it has made us reliant on data services, and we might have forgotten that voice services are still a far more powerful service. If we happen to be stuck on the highway in a rural area without data access, how will we make phone calls? If a powerful storm knocks out our electricity and wifi,

leaving only our wireless technology -- do we have plans in place for that?

The future is technology driven and we must not lose sight of that. It is very easy for industry to be innovative and bring new products to the market, but very often they develop these without input from the deaf community. It is common that people with disabilities are not at the table during the planning and design process.

Fortunately with TDI's continued partnership and strong policy presence, TDI is in a good place to ensure the industry continues to listen and be mindful of our needs. However, TDI cannot be successful without its support and engagement of its members.

I would encourage every deaf and hard of hearing person to at least subscribe to our newsletters or follow us on social media. Tell your friends and family members to do the same. The more we work together as a community, the greater our rewards will be.

You can start by visiting TDIforAccess.org and subscribe to eNotes. Register for a TDIBlueBook.com account, or just check us out on any social media platform using [/TDIforAccess.org](http://TDIforAccess.org).

(CS) Again, congratulations, and best wishes! You will do great leading TDI in the future and for a better, more accessible world!

**STOUT INTERVIEW** Continued from page 6

consumer groups and academia, often a total of seven to ten of them before we make any one filing with the FCC. We are more actively contacted by industry and government for input on key policy issues. We have to be proactive, not just reactive in our work. The expectations for TDI are much higher today from the deaf and hard of hearing community to address their access needs and issues, as the number of technological changes are much more than the work we humans try to accomplish on a daily basis.

What advice/wisdom do you have for the new CEO?

- a. Have an open mind.
- b. Allow for any one specific goal to become a better, more revised/practical one with the help of others.
- c. Use the power of social media for as many purposes.
- d. While we will continue to address the needs and issues of those who are deaf and hard of hearing, whether they know sign language or not, and that they have a second disability, like mobility, let us always remember not

to forget the deafblind community, we must give this group a bit more attention and commitment. Their lives are more challenging than the rest of us have.

What are your plans for retirement?

Hopefully to travel across America in a RV, and to play a good amount of golf. To spend more time with our two children, Abby and Ty, and their spouses - Katie and Emily, and their four children (our grandchildren) - Landon, Logan, Frankie, and Miles.





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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

Petition for Emergency Waiver and Declaratory Ruling - 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 • Implementation of the Twenty-First Century Communications and Video Accessibility Act of 2010, Section 105, Relay Services for Deaf-Blind Individuals • CG Dockets Nos. 03-123, 10-51, and 10-210

■ (April 2) TDI, AADB, NAD, HLAA, ALDA, CPADO, ADARA, DSA, and DHH-RERC submitted a petition for emergency waiver and declaratory ruling to the FCC. Consistent with the Commission's ongoing efforts to ensure access to communications during the coronavirus (COVID-19) pandemic and to "ensure the uninterrupted availability of telecommunications relay services (TRS)," the Consumer Groups and accessibility researchers urge the Commission to:

1. Temporarily waive the relay service registration and pre-call verification rules to the extent necessary to ensure that all legitimate users can use the relay system under emergency circumstances; and
2. Issue a declaratory ruling clarifying that software necessary for DeafBlind users to access the relay system can be provided by relay providers and reimbursed from the TRS Fund as well as being distributed via the National Deaf-Blind Equipment Distribution Program (NDBEDP) for those who qualify for the income threshold.

For millions of Americans who are deaf, hard of hearing, or DeafBlind and those who have additional disabilities, accessible telecommunications services are the only window to social interaction with the outside world as they practice social distancing in the midst of the coronavirus (COVID-19) pandemic. We applaud the Commission for recognizing hurdles imposed by the pandemic in waiving other TRS



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rules. Those waivers have allowed for the people who make relay services possible to work from home consistent with social distancing mandates and helped ensure that consumers' rights to communicate on equal terms have been fulfilled during this chaotic period. Consistent with the Commission's recognition of the "overwhelming interest" in "ensuring the continued availability of TRS services during this national emergency," the Commission should also temporarily waive the relay service registration and pre-call verification rules to the extent necessary to ensure that all legitimate users can use the relay system under emergency circumstances. Likewise, the Commission should issue a declaratory ruling clarifying that software necessary for DeafBlind users to access the relay system can be provided by relay providers and reimbursed from the TRS Fund as well as being distributed via the National Deaf-Blind Equipment Distribution Program (NDBEDP).

<https://ecfsapi.fcc.gov/file/1040206364837/2020.04.02%20TDI%20AADB%20et%20al.%20Relay%20Emergency%20Waiver%20and%20Declaratory%20Ruling%20Petition.pdf>

Ex Parte - Petition for Emergency Waiver and Declaratory Ruling - 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 • Implementation of the Twenty-First Century Communications and Video Accessibility Act of 2010, Section 105, Relay Services for Deaf-Blind Individuals • CG Dockets Nos. 03-123, 10-51, and 10-210

■ (April 9) On April 9, 2020, TDI's counsel Blake Reid, and Kelsey Fayer and Cooper Tollen, student attorneys in the SamuelsonGlushko Technology Law & Policy Clinic at Colorado Law (TLPC), met with Diane Burstein, Eliot Greenwald, Bob Aldrich, Michael Scott, and Jackie Ellington of the Consumer and Governmental Affairs Bureau to discuss the April 2, 2020 Petition for Emergency Waiver and Declaratory Ruling filed in above-referenced dockets. We reiterated the points raised in the Petition, which urges the Commission to:

1. Temporarily waive the relay service registration and pre-call verification rules to the extent necessary to ensure that all legitimate users can use the relay system under emergency circumstances; and
2. Issue a declaratory ruling clarifying that software necessary for DeafBlind users to access the relay system

can be provided by relay providers and reimbursed from the TRS Fund as well as being distributed via the National Deaf-Blind Equipment Distribution Program (NDBEDP) for those who qualify for the income threshold.

We noted that people who are deaf, hard of hearing, or DeafBlind and those who have additional disabilities often need assistance obtaining and submitting the necessary documentation to register for relay service. For example, while some providers may have installed enterprise videophones in some hospitals, these and similar approaches are likely to falter in overwhelmed hospitals that are resorting to field tactics such as placing patients in outdoor field hospitals that may lack typical connectivity. We are open to any approach that ensures (a) that consumers who encounter fail codes during the registration process are able to provisionally register for relay service during the COVID-19 emergency and (b) are able to access relay service during that period. We also discussed how software necessary to access relay services for DeafBlind people is distributed and reimbursed. It is our understanding that at least some significant subset of DeafBlind people who currently lack access to relay could meaningfully access and use relay service on an emergency basis with remote training if provided with access to software such as myMMXdb, and that both providers and distributors of the software are likely to devise creative solutions for providing that training. We also noted that this software is essential to accessing relay service for DeafBlind people, and that without it many people are effectively being denied the functionally equivalent service to which they have a right under Section 225. We noted the disparity of requiring DeafBlind people to procure the software separately, often at their own expense, when other relay services routinely provide necessary hardware and software free of charge. While DeafBlind relay software can be acquired through the NDBEDP, this is limited to people who fall under the statutory income threshold. For people who do not qualify, the software may be prohibitively expensive for them to purchase on their own, and as a result is effectively impossible to acquire for many DeafBlind people. We reiterated that this software could be reimbursed in some other way if provided directly to consumers by relay providers. Whatever the form of the relief granted by the Commission, the most important priority is ensuring that all legitimate users have access to a functionally equivalent way of communicating with their friends, family, doctors, and



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others in this time of social isolation and distancing.

<https://ecfsapi.fcc.gov/file/10408075412507/2020.04.08%20Relay%20Emergency%20Waiver%20and%20Declaratory%20Ruling%20Ex%20Parte.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

(April 20) HLAA, TDI, NAD, ALDA, CPADO, AADB, DSA, DHH-RERC, and IT-RERC submitted comments to the FCC on the amendment to the application of InnoCaption for certification as a provider of IP Captioned Telephone Service (IP-CTS). The above-referenced Consumer Groups and accessibility researchers respectfully submit these comments in response to the Amendment to Application of InnoCaption for Certification as a Provider of IP Captioned Telephone Service in the above-referenced dockets. We remain concerned about reviewing ASR-based provider certifications without first creating technology-neutral minimum standards and ensuring that sufficient information is made available to the public regarding each provider's specific ASR offerings. To be clear: many of our members are InnoCaption users and we are not opposed to InnoCaption's offerings, or to the long-term phase-in of ASR-based solutions more generally. But we remain concerned about the Commission's approach of bringing into the marketplace without sufficient understanding of the implications of doing so or data and information about the consequences for consumers, and our concerns have not changed since we last spoke with the Commission about this issue in January. Moreover, InnoCaption, like other ASR-based providers, has specifically asked the Commission for a limited waiver of Rule 64.604(a)(3)(vii), which governs interactive voice response (IVR) systems. This type of waiver, if granted, would allow ASR-based providers to use their offerings to transcribe IVR systems to consumers without identifying that the IVR system is a recorded message and interactive menu. This raises the possibility that consumers using ASR-based offerings may face difficulties navigating pervasive IVRs, and shortcuts the possibility that ASR-based offerings could evolve to address these difficulties.

<https://ecfsapi.fcc.gov/file/10420972403135/2020.04.20%20Consumer%20Groups%20and%20Accessibility%20Researchers%20Innocaption%20Comment%20final.pdf>

Closed Captioning

Reply Comments - In the Matter of - 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

■ (March 6) TDI, DHHCAN, HLAA, NASADHH, DSA, DHH-RERC, NAD, ALDA, CPADO, and IT-RERC submitted reply comments in response to comments of Pluto, Inc. submitted on February 21, 2020 regarding Pluto TV's Petition for Waiver originally filed on May 15, 2019. Consumer groups also respond to Pluto's request for guidance with respect to additional platforms by asking that Pluto suspend its service altogether on noncompliant platforms unless and until it can fully comply with IP captioning requirements on those platforms. Consumer groups acknowledge Pluto's success in bringing the Vizio Via and Samsung Tizen 2016 into compliance. Nevertheless, Pluto remains noncompliant with the Commission's IP Requirements on no fewer than eight platforms. In its comments, Pluto continues—as in its initial petition—to describe the backwards compatibility challenges it faces as it attempts to retrofit advanced technologies with older platforms. Because Pluto created these difficulties by years of its own inaction, these problems should be disregarded by the Commission in its application of the good cause standard. In its comments, Pluto welcomes the views of other interested parties and Commission staff on how to proceed with the Pluto TV application on [the PlayStation, Samsung Orsay, and Xbox 360], including whether the public interest would best be served by granting a permanent waiver of the applications on these platforms or, alternatively, sunseting the app on these platforms altogether. For the reasons explained above and in their opposition, consumer groups cannot support the granting of Pluto's requested waivers under either the economic burden or good cause standard, and are particularly concerned about the policy implications of excusing Pluto's ongoing captioning noncompliance on the grounds that the company waited so long to comply that it created insurmountable backwards compatibility challenges for itself. For the foregoing reasons, consumer groups reiterate that the Commission should deny Pluto's petition.



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<https://ecfsapi.fcc.gov/file/10306263942065/Pluto%20Reply%20Comments%20on%20Petition%20Filed%203-6-2020.pdf>

Ex Parte 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

■ (April 24) TDI, NAD, HLAA, ALDA, CPADO, DSA, CCASDHH, DHH-RERC, and IT-RERC submitted an ex parte to the FCC in response to NCTA's February 25, 2020 ex parte in the above-referenced docket discussing NCTA's understanding of the intersection between automated speech recognition (ASR) technology and the Commission's rules for the quality of closed captions for live television programming. NCTA contends that the use of ASR for live captions is governed by the best practices for live programming under Rule 79.1(k). NCTA likewise argues the best practices are technology-neutral and applicable to ASR as long as ASR generated captions are subject to human oversight. As the Consumer Groups and accessibility researchers explained in our January 17, 2020 ex parte, the use of ASR is inconsistent with the numerous human centric requirements of the live captioning best practices. These include oversight and training for captioners, requirements for captioners to complete self-evaluations of their performance, for captioners to keep up with current events, and other human-centric standards. Instead, we understand that the Commission's current practice is to evaluate ASR-generated captions for live programming under the general caption quality standards outlined in Rule 79.1(j)(2)9 pursuant to the requirement in Rule 79.1(m)(1)(ii). While we agree that the use of human oversight is critical to ensure that ASR yields high-quality captions, the best practices for humans do not provide a rubric for the evaluation of the quality of captions and instead focus on procedures for human captioners and the Electronic Newsroom Technique (ENT) that are not clearly applicable to ASR-generated captions, even where supplemented by human oversight. The Commission has not provided any guidance on how ASR could comply with these practices, nor is it clear how such guidance would be possible. Because confusion continues to persist about how the Commission is evaluating the quality of ASR-generated captions, the Commission

should issue public guidance on its enforcement of the quality rules for ASR to ensure that they serve consumers' rights to access video programming on equal terms, particularly during the course of the COVID-19 pandemic where access to accurate information is critical to the health and safety of all Americans.

<https://ecfsapi.fcc.gov/file/104241653802221/2020.04.24%20Consumer%20Groups%20and%20Accessibility%20Researchers%20Ex%20Parte%20ASR.pdf>

Miscellanea

Comments - In the Matter of Sections 716 and 717 of the Communications Act of 1934, as Enacted by the Twenty-First Century Communications and Video Accessibility Act of 2010 • CG Docket No. 10-213

■ (April 14) TDI, NAD, DHHCAN, ALDA, CPADO, AADB, DHH-RERC, and IT-RERC submitted comments in response to the Federal Communication Commission's Public Notice released on March 2, 2020, seeking comments to inform the preparation of the 2020 Biennial report to Congress required by the Twenty-First Century Communications and Accessibility Act of 2010. The Consumer Groups and the RERCs are grateful for this opportunity to once again provide input on this important matter. We have reviewed our Comments filed on May 3, 2018, which are attached hereto, and found that many of the accessibility issues remain. In these Comments, we update certain of those issues and provide additional information as appropriate.

Based on the Commission's most recent list, approximately 2143 PSAPs have implemented Text-to-911.

While this is a significant increase from the 939 PSAPs that the Consumer Group understood were Text-to-911 capable at the time of our 2018 CVAA Comments, it only represents approximately 25 percent of all PSAPs, ... as reported by NENA as of July 2018. RTT-to-RTT 911 is the next step in improving accessibility for deaf and hard of hearing persons to reach emergency services. While nationwide carriers must support RTT on their wireless devices, most PSAPs are not currently capable of supporting, or do not support, RTT-to-RTT 911.

The Universal Registration Database, which is used by deaf



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and hard of hearing consumers to obtain a relay service account, may be itself inaccessible to DeafBlind people when an initial registration is rejected and proof-of-residency documentation is required. The financial qualifications for the National DeafBlind Equipment Distribution Program (NDBEDP) results in some DeafBlind individuals having to choose between access to vital communications equipment and job opportunities including pay raises or higher paying job offers. Further, for DeafBlind individuals that receive Braille displays through the NDBEDP, there are challenges in obtaining satisfactory (or any) training on how to set up or use the devices. (Some) deaf and hard of hearing persons that also have mobility disabilities, need a full-functional smartphone in a bigger size, like a tablet, for the device to be functional for them; larger devices are easier to focus on the screen with body/hands and eye-contact and are easier to type on.

TDI, HLAA, and NAD are members of the Joint HAC Task Force with ATIS, which held its inaugural meeting on February 11, 2020. They look forward to collaborating with wireless carriers, original equipment manufacturers and hearing aid manufacturers toward hearing aid compatibility with all wireless devices.

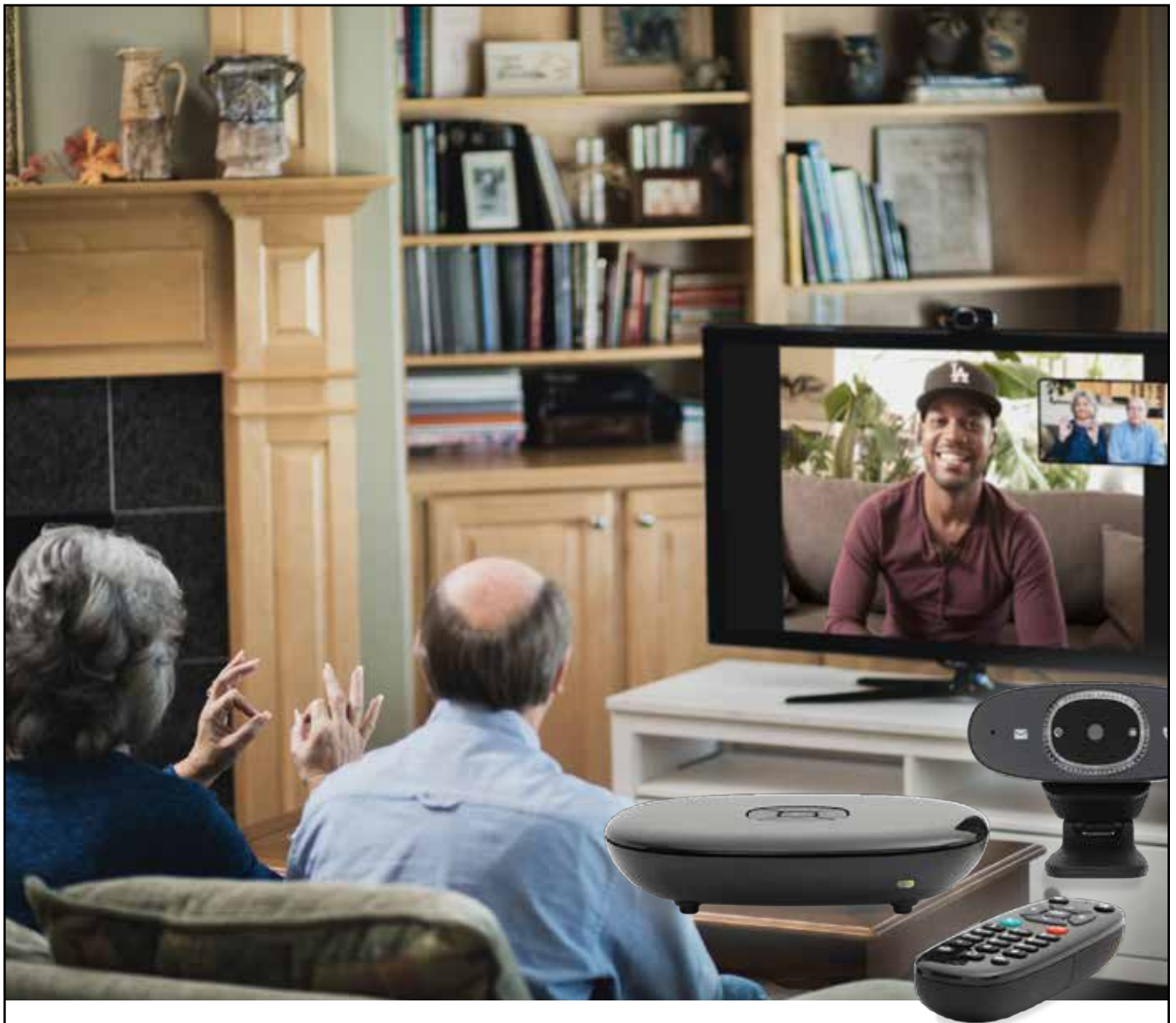
The Commenters continue to find certain kinds of advanced communication services (ACS) not to be fully accessible to deaf, hard of hearing, and speech impaired persons, deafblind, and deaf people with other disabilities. While not usually totally inaccessible, many ACS have only limited accessibility. For example, many deaf and hard of hearing people continue to be unable to access or fully participate in games that use ACS components for communication between participants. Video conferencing services, particularly on smartphones, often do not include accessible alert functions such as vibration and/or flashing lights. While many deaf and hard of hearing people also enjoy video conferencing services, these services, are not completely accessible and usable by deaf and hard of hearing people. The following issues ... still exist today: 1. Relay services are not accessible through video conferencing services because they are tethered to ten-digit telephone numbers; 2. Video conferencing services, including off-the-shelf services, need to be interoperable with videophones provided by Video Relay Service (VRS) providers. 3. Video conferencing services need to be interoperable with each other. and 4. Video conferencing services need to allow users to prioritize specific functions so that they best support the communications needs of the deaf and hard of hearing user.

The recent COVID-19 crisis has highlighted some of the continued shortcomings with respect to the accessibility of important communications for our community. As discussed below, the negative effects that data caps and throttling measures have on the ability of deaf and hard of hearing people to communicate are exacerbated during this time of physical distancing and self-isolation. Certain other shortcomings, however, such as access to live programming and in particular news conferences may not be a subject of the CVAA Report, but are extremely concerning and need to be addressed. For example, there have been instances where broadcasters have failed to provide captions for news conferences; captions have been provided in the live television broadcast version of the program but not in live Internet version of the program; cameras have failed to keep the ASL interpreter in the frame when an ASL interpreter is even provided; and DeafBlind individuals with no sight at all often have no access to these news conferences because transcripts are not readily available, if at all. This lack of access sometimes forces us to rely on other, often not as trustworthy, sources such as social media for this very important information thus endangering our community.

Last but not least, the commenters reiterate the prior suggestion that “the Commission require industry participants to produce periodic activity reports that specifically account for research and development activities that directly involve the deaf and hard of hearing community.”

<https://ecfsapi.fcc.gov/file/10415049237300/Comments%20for%202020%20CVAA%20Biennial%20Report.pdf>





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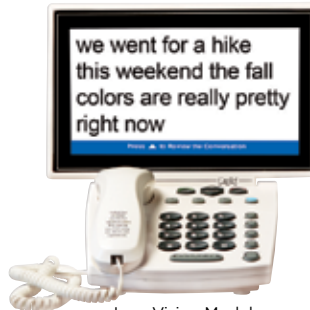
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