



WORLD

Technology News and Commentary for Deaf and Hard of Hearing People



A TRANSITIONAL YEAR

BEGINS ON PAGE 6

ALSO INSIDE:

FCC Transition Priorities — pg 6

White House Accessibility — pg 13

Thank You Donors — pg 19

ADDRESS SERVICE REQUESTED

Telecommunications for the Deaf and Hard of Hearing, Inc. (TDI)
P.O. Box 8009
Silver Spring, Maryland 20907

Non-Profit Org.
U.S. Postage
PAID
Dulles, VA
Permit No. 163



Life-changing Solutions

When it comes to understanding what's said on the phone, Hamilton® CapTel® makes all the difference. Reliable and accurate captions of what's said ensure clarity on every call – eliminating the frustration even a simple phone call can make for people with hearing loss.

Explore all of the Hamilton CapTel solutions today!

HamiltonCapTel.com/TDI1120

110620

FEDERAL LAW PROHIBITS ANYONE BUT REGISTERED USERS WITH HEARING LOSS FROM USING INTERNET PROTOCOL (IP) CAPTIONED TELEPHONES WITH THE CAPTIONS TURNED ON. IP Captioned Telephone Service may use a live operator. The operator generates captions of what the other party to the call says. These captions are then sent to your phone. There is a cost for each minute of captions generated, paid from a federally administered fund. To learn more, visit fcc.gov. Voice and data plans may be required when using Hamilton CapTel on a smartphone or tablet. Hamilton CapTel may be used to make 911 calls, but may not function the same as traditional 911 services. For more information about the benefits and limitations of Hamilton CapTel and Emergency 911 calling, visit HamiltonCapTel.com/911. Courtesy of Cisco Systems, Inc. Unauthorized use not permitted. Third-party trademarks mentioned are the property of their respective owners. Third-party charges may apply: the Hamilton CapTel phone requires telephone service and high-speed Internet access. Wi-Fi capable. Copyright © 2020 Hamilton Relay. Hamilton is a registered trademark of Nadelco, Inc. d/b/a/ Hamilton Telecommunications. CapTel is a registered trademark of Ultratec, Inc.

WHAT WE DO

“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

DHHCAN Policy	pg 6
NASADHH	pg 9
FCC Transition Priorities for 2021.....	pg 11
Biden Plan.....	pg 13
CGs meet with BH Team.....	pg 17
Thank you to our sponsors	pg 18
Thank you to our donors	pg 19

REGULAR COLUMNS

Board Views: Carpe Diem!	pg 2
By Jan Withers, TDI President	
The New Normal: A World of Inclusion	pg 4
By Eric Kaika, Director of Public Relations	
TDI in Action (June - August 2020).....	pg 16

Thanks to These Advertisers:

ALDA, pg 16 • Hamilton Relay, inside front cover
Sorenson VRS, inside back cover • Ultratec, back page

Contact TDI WORLD editor for reprints of articles in PDF format.

TDI WORLD is published quarterly by TDI to provide information about telecommunications, media and information technology access for people who are deaf, late-deafened, hard of hearing and deaf-blind. You may freely copy and distribute all or portions of TDI WORLD for non-commercial use with credit given to TDI. TDI has no affiliation with any company advertised, and the mention of company names, products and services in the articles herein comes solely from the authors' own experiences and does not imply accuracy nor endorsement by TDI. Furthermore, TDI does not warrant any products or services mentioned in TDI WORLD to be in compliance with any applicable federal, state or local disability access laws and regulations or industry standards.



WORLD

Volume 51.4

Editor-in-Chief: Eric Kaika

Publication Production: Electronic Ink

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

CENTRAL REGION

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

CHIEF EXECUTIVE OFFICER

Eric Kaika
 Kaika@TDIforAccess.org

BUSINESS MANAGER

John Skjeveland
 Finance@TDIforAccess.org

TDI

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

TELEPHONE:

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

To subscribe to **TDI eNotes**,
 send an email to

PubRel@TDIforAccess.org

Follow **TDIforAccess** on



Shaping An Accessible World

Board Views



JAN WITHERS

*TDI President and Board Member,
Southwest Region*

“There are times when national events and trends present TDI an invaluable opportunity to reshape and promote its priorities – now is such a time.”



Carpe Diem!

Presidential Transition

Whenever there is a U.S. Presidential transition such as the one that occurred in January 2021, TDI and its partners traditionally draft and submit to the Presidential transition team position papers on their respective policy priorities for the next four years. On January 13, 2021, a group of about 25 advocates representing Deaf, Hard of Hearing, Late-Deafened, DeafBlind, and Deaf-Mobile Disabled people met with representatives of the Biden Transition Team to present their policy priorities. This meeting is believed to be the first such meeting that focused only on this specific population rather than commingling all the different disabilities as had occurred during previous Presidential transitions. The significance of such a focus is that our needs as a population differ in so many important ways from those of other disability populations and therefore merit specific attention.

Among those in attendance on January 13 is a long-standing group of advocates called Deaf and Hard of Hearing Consumer Action Network (DHHCAN), of which TDI is a member. DHHCAN developed a document entitled, “Proposal for Leadership and Public Policy to Ensure Equal Access and Opportunity for

Deaf, Hard of Hearing, Late-Deafened, DeafBlind and Deaf-Mobile Disabled Americans.” This document includes a section on telecommunications, information services, and video programming. In addition, TDI developed a more targeted document entitled, “Transition and 2021 FCC Priorities for Communications Accessibility.”

President Biden’s administration has produced a document entitled, “The Biden Plan for Full Participation and Equality for People with Disabilities.” You will find that the priorities noted in this document dovetail with those of DHHCAN and TDI.

You can read all three of the
aforementioned documents at the
following websites:

<http://dhhcan.org/policy-proposals/>

<https://joebiden.com/disabilities/>

<https://tlpc.colorado.edu/tlpc-and-georgetown-communications-and-technology-law-clinic-draft-accessibility-agenda-for-fcc-transition-team/>

TDI's Partners

None of the above-referenced work would be possible without TDI's network of outstanding partners.

BOARD VIEWS Continued from page 2

Please go to page 8 to see the list of all the members of DHHCAN. Another partner is Blake Reid, Clinical Professor at Samuelson-Glushko Technology Law & Policy Clinic (TLPC) • Colorado Law, University of Colorado Boulder, who drafted the 2021 TDI transition document with support from Communications and Technology Law Clinic (CTLC) at Georgetown Law.

A relatively new partner is the National Association of State Agencies of the Deaf and Hard of Hearing (NASADHH). In December 2020, Eric Kaika, TDI's CEO, along with Howard Rosenblum, CEO of the National Association of the Deaf, and Barbara Kelley, Executive Director of Hearing Loss Association of America,

presented to NASADHH's state directors on their respective policy priorities. Increasingly, all three national organizations recognize the value of their state partners, primarily as "boots on the ground" entities that could contribute to their advocacy efforts at the national/federal level. One example is the ability of State agencies to spread the word among their own communities about TDI's policy advocacy and educational endeavors and to encourage these communities to support in tangible ways TDI's efforts. Another example is State agencies could also encourage their communities to participate in TDI's periodic surveys. Results of these surveys may be used in TDI's efforts to educate federal policy makers on the types and scope of adverse accessibility issues faced by

many in the areas of Information and Communications Technology.

If not for the wonderful support of our partners, TDI would not be able to leverage its policy advocacy work in so many important ways.

The Next Four Years

Due to President Biden's heightened emphasis on supporting people with disabilities, we anticipate the next four years will bring increased activity throughout the federal government as well as in the United States Congress, hopefully resulting in new, updated, or strengthened policies, regulations and legislation. TDI will continue to work closely with its partners, and we certainly will keep you up to date on TDI's activities advocating its policy priorities.




Contribution Form



☐ \$25 ☐ \$50 ☐ \$100 ☐ \$200 ☐ Other \$ _____

Name _____

Mailing Address _____

____ Sign me up for the free *TDI* eNotes at this email address _____

____ If donation is in honor or memory of an individual, please give name, address and any special instructions.

____ I want my donation to be anonymous.

*Mail or fax this contribution form (photocopies OK)
payment (check, money order or credit card information) to the TDI office:*

TDI - PO Box 8009, Silver Spring, MD 20907

Phone: 301- 563-9112

info@TDIforAccess.org • www.TDIforAccess.org

Our Quest for Access



BY ERIC KAIKA
Managing Editor

**“Innovation
has made
communication
possible through
unorthodox objects
like watches,
speakers, and cars.”**



The New Normal: *A World of Inclusion*

What a year, 2020 was a baptism by fire for me in a number of ways. Accepting the TDI CEO job, navigating the pandemic, embracing the virtual work environment while training six new interns. A lot of our priorities were on hold as we waited for the U.S. election results. As the new year rolls in and our direction is becoming clearer, we can begin to calibrate our strategies when proposing policy to the new White House administration and designated Federal Communications Commission (FCC) chief. Our interns are being quickly caught up and are eager to join us in our ongoing accessibility campaign.

So what's in store for TDI as 2021 rolls around? President Biden published a 20+ page Disability Plan and we will share some highlights in this issue. In regard to the plan, TDI is focusing on ICT (Information and Communication Technology) an umbrella term that encompasses a wide range of technology that people use to communicate. To that end, we met with the National Association of State Agencies of the Deaf and Hard of Hearing (NASADHH) and FCC and shared deaf/hh policy priorities that we will submit to the Biden Administration some of which will be featured in this issue as well.

Innovation has made communication possible through unorthodox objects such as smart speakers, watches, and automobiles. These new tele-platforms present unique challenges for our accessibility needs. Relay services are not compatible with these technologies -- which could be classified as telecommunication products. TDI must be constantly on guard and continue to advocate and advance policy demands for people who are deaf and hard of hearing.

We will advocate for our Relay Companies' ability to support Advanced Communication Systems. We will promote and educate our community about RTT (real time texting). Another area of focus will be with ASR (automatic speech recognition) ASR which is positioned to become the industry's preferred captioning tool and we must ensure it's on par with existing live captioning standards.

We can't look back on 2020 without recognizing the huge impact we had from our donors. They are an essential component of our organization. It is due to these wonderful people and sponsors that we are able to secure a future and focus on our vital mission of advancing access and rights. Many thanks for a wonderful year! I look forward to sharing more about our vision in the next issue.





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

Bold = *required* information.

Name (first, middle, last): _____

Mailing Address: _____
(street) (city) (state) (zip code)

Email Address: _____ Birthdate: _____

Home Phone: _____ Mobile Phone: _____

TDI Blue Book is now online: TDIBlueBook.com

*TDI Blue Book is available online!
TDI members can manage their Blue Book listing.
Visit 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) \$ _____

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

TOTAL \$ _____

Credit card number: _____

Expiration: _____ CW / CV1: _____

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

Mail form & payment: **TDI, 940 Thayer Ave #8009, Silver Spring, MD, 20910**

Thank you for supporting TDI !

DHHCAN Proposal for Leadership and Public Policy

During Presidential Election campaign years, the Deaf and Hard of Hearing Consumer Advocacy Network (DHHCAN) shares its Proposal for Leadership & Public Policy to Ensure Equal Access & Opportunity for Deaf, Hard of Hearing, Late-Deafened, DeafBlind, and Deaf-Mobile Disabled Americans.

Presidential nominees and their campaign parties are encouraged to review and incorporate these proposals in their executive proposals for their term.

DHHCAN serves as the national coalition of organizations representing the interests of deaf and/or hard of hearing citizens in public policy and legislative issues relating to rights, quality of life, equal access, and self-representation. DHHCAN's primary policy focus are on:

- Civil Rights Protection and Enforcement,
- Education,
- Employment,
- Health Care,
- Housing,
- Information and Communication Technologies, and
- Transportation

The full policy document is 20-some pages long, and can be viewed at <http://dhhcان.org/policy-proposals>. The following is the Telecommunications, Information Services, & Video Programming proposal, in which TDI reports on during DHHCAN meetings:

1. Issue an executive order directing that all federal agencies and related commissions review their rules and regulations for compliance with existing laws and policies that ensure effective access to communication and information by people with hearing disabilities.
2. Coordinate with the Federal Communications Commission (FCC) to have its Disability Rights Office build on its commendable work such as providing guidance or information on its services through videos that are both captioned and interpreted in ASL, generating quarterly reports on consumer complaints about the accessibility of telecommunications and video programming equipment and services, expanding the role and functions of its Disability Advisory Committee to provide input and solutions on a range of access issues that are under the FCC's jurisdiction, and ensuring that appropriate investigation and resolution are made for all disability-related complaints.
3. Work with the FCC to ensure that Internet-based and digital telephone and television technologies are accessible, usable, and compatible to people who are deaf and hard of hearing, also those who are DeafBlind or deaf and mobile-disabled under the 21st Century Communications and Video Accessibility Act (CVAA) - and that they offer access to telecommunications relay services (TRS). Such new technologies or shifts include but are not limited to gaming systems, Virtual Reality (VR), HD Voice, Real-Time Text (RTT), video telephony, amplified phones, and the Internet of Things (IoT). Consider the following examples for the DeafBlind: new ovens in the market today are no longer tactile-controlled, but are driven by a touch screen; and when captions are shown on television or on the Internet, the caption data can be sent untethered, such as passing through a wireless network to a Braille device, which is used by the DeafBlind to follow the video program by reading captions via Braille from his or her Braille device.
4. Encourage the FCC to establish a firm action plan to ensure that outstanding closed captioning issues are addressed and resolved. These issues include reforming the complaint system, narrowing or eliminating the current categorical exemptions from the FCC's closed captioning rules, and reports or updates on best practices in caption quality from the 2004, 2011, and 2019 captioning quality petitions by a coalition of national consumer groups of, by, and for the deaf and hard of hearing. This also includes regulatory action by the FCC to adopt a schedule to phase out inferior electronic newsroom technique captioning for local news, weather, and sports outside the top 25 markets nationwide; implement metrics for live captioning quality; and transition to techniques that are at least functionally equivalent to real-time captioning.
5. Coordinate with the FCC and, if necessary, Congress to address holes in the coverage of the FCC's Internet Protocol captioning rules for online-exclusive content that has never been published or exhibited on television.

BIDEN PLAN Continued from page 6

6. Coordinate efforts with Congress, appropriate federal agencies, consumer advocates, and key stakeholders to spearhead full government response with adequate legislative or regulatory action, training, and financial wherewithal to ensure direct and equal access by people with hearing disabilities to next generation 9-1-1 services and wireless emergency alerts.
7. Ensure that the FCC fully implements its recent decisions related to its Connect America Fund initiative to pave the way for its Universal Service Fund (USF) programs to subsidize low-income deaf, hard of hearing, late-deafened, and DeafBlind individuals and their service providers (for instance, schools and libraries) in the acquisition of broadband service to partially cover the cost of telecommunications devices, and to conduct a meaningful outreach campaign to ensure access to information and communication by deaf, hard of hearing, late-deafened, and DeafBlind individuals across America. In particular, the administration should ensure that the FCC accounts for the need for deaf and hard of hearing people, as well as people with speech disabilities, to access plans with increased data limits to accommodate the use of relay services as basic communications.
8. Provide full support for captioned radio technology, which is currently languishing after some encouraging research and development by National Public Radio, Towson University, and its other partners.
9. Coordinate with Congress and the U.S. Copyright Office to implement appropriate exemptions and limitations in copyright law, including the exclusive rights of copyright holders and the anti-circumvention measures in Section 1201 of the Digital Millennium Copyright Act, to ensure that the development of accessibility technology, accessible adaptations to and of content including closed captions, and accessibility services are not hindered by copyright concerns.
10. Fully support the FCC's Report and Order Released August 5, 2016 that take steps to implement a historic consensus proposal drafted in a collaborative effort by consumer organizations working with the wireless industry. These efforts will ensure people with hearing loss have greater access to innovative wireless handsets over the next few years, and pursue a goal of 100% hearing aid compatible handsets deployment in eight years.
11. Enlist the White House's support in coordination with the U.S. Department of Health and Human Services to provide funding for expanded activities addressing the technology needs of Americans who are deaf and hard of hearing with its Rehabilitation Engineering Research Center and other related funding programs.
12. Secure a strong commitment from the White House to fulfill the promise and potential of the ADA, specifically the fourth provision for a national telecommunications relay service program. The relay service program has witnessed some meaningful progress in twenty-six years. Today, several forms of relay services are being offered to a diverse deaf and hard of hearing population and their hearing contacts across the nation, but new initiatives are needed in the next few years to achieve functional equivalency using relay service at a "state of the art" level.
13. Coordinate efforts from both the FCC and the U.S. Department of Justice to make revisions, and then enforce their respective policies and regulations for accessible technologies and services in prisons at federal, state, and local levels for Americans who are deaf and hard of hearing that are incarcerated in these facilities.
14. Encourage the FCC to spur competition and innovation in the video navigation marketplace that would improve the accessibility of multichannel video programming for deaf and hard of hearing consumers, while making clear that all competitive navigation devices—whether hardware, software, or a combination of both—will be subject to the FCC's accessibility rules.
15. Support addressing unique access needs in critical communication and information avenues for those who are DeafBlind, have low vision, a speech disability, or are deaf or hard of hearing, and have an additional disability such as mobility.
16. Encourage or mandate more public places to require that their public television sets display captioning. Recent examples include the City of Portland, Oregon, U.S. airports as mandated by the U.S. Department of Transportation, and the state of Minnesota (medical facilities).

DHHCAN members



NASADHH Presentation Summary

On December 9, 2020, Hearing Loss Association of America (HLAA), National Association of the Deaf (NAD), and TDI met with members of the National Association of State Agencies of the Deaf and Hard of Hearing (NASADHH).

The National Association of State Agencies of the Deaf and Hard of Hearing is comprised of administrators of the state agencies serving deaf and hard of hearing. The purpose of NASADHH is to function as the national voice of state agencies serving Deaf and Hard of Hearing people and promote the implementation of best practices in the provision of services.

NASADHH invited HLAA, NAD, and TDI to share each respective organization's priorities for 2021 and identify how NASADHH can help support our goals for 2021. Below is a summarization of TDI's presentation:

TDI does an enormous amount of policy work in areas of telecommunications, media, and information technology. TDI's mission is to ensure all communications by phone, cable, broadband, television, satellite, and radio are fully accessible to all deaf, hard of hearing, late-deafened, deafblind, and deaf+ Americans.

TDI is heavily involved in telecommunications relay, closed captioning, TTY / Real Time Text (RTT) compatibility, and emergency communications. TDI also monitors new and emerging technologies like automated speech recognition (ASR), Internet of Things (IoT), gaming, advanced communication systems (ACS), extended reality: virtual and augmented reality (XR: VR & AR), autonomous driving, and more.

We have four law firms / clinics that represent TDI in our policy filings. Since 2000, TDI has submitted nearly 1,800 filings to the Federal Communications Commission. We work closely with NAD, HLAA, and Gallaudet as part of our core policy group. We also share our filings with many other organizations, inviting them to sign-on.

For 2021, TDI is prioritizing the following initiatives:

- **21st Century Communications and Video Accessibility Act of 2010 (CVAA)**
 - Update the current CVAA (a "CVAA 2.0", if you will) to require all web videos to be captioned.

- Expand audio descriptions, image descriptions, et cetera in web-content.

■ NASADHH can help us by collecting and sharing consumer concerns and issues related to inaccessible captioning via the internet & TV, and pass these onto TDI / NAD / HLAA.

- **Real Time Text (RTT)**

- Ensure all carriers are in compliance.
- Direct RTT connection to 9-1-1, 711, 988 and other N11 numbers.

■ NASADHH can help us by turning on and using your smartphone's RTT, sharing information about RTT with your communities, check-in with your state's PSAPs (9-1-1 call centers) and relay programs on RTT readiness.

- **Automated Speech Recognition / Captioning**

- Require standards and metrics for ASR in captioning (TV and phone). Ensure ASR matches or exceeds live, human-generated captioning. Until then, ASR should not be used in emergency situations and broadcasts of critical importance.
- Goes hand-in-hand with CVAA 2.0 (100% web captioning: use ASR for consumer generated videos)

■ NASADHH can help us by collecting consumer complaints and issues related to incomprehensible, slow captioning and pass these onto us. Short videos, screenshots, date/time/station/location are all helpful information. Generally consumers are encouraged to directly contact the TV channel to resolve their issue, but sharing these issues with TDI or NAD and HLAA, can help us strengthen our policy arguments.

- **Relay Services**

- Deafblind relay service - need to ensure DB have full access to relay, including compatibility with

NASADHH PRESENTATION Continued from page 9

their screen readers, braille systems, and pro-tactile support.

- Deaf interpreters in relay - to support hearing relay interpreters (CAs) when facilitating a call for those with mobility/dexterity challenges, and other issues that impede the Communication Assistant from fully understanding the conversation.
- Video and captioning interoperability with virtual platforms. Rather than d/hh consumers having separate operating systems for relay and virtual meetings, caption telephone services and video relay services should be interoperable since they all rely on broadband and telephone wires.

■ NASADHH can help us by engaging your local deafblind and marginalized communities to drum-up support for a fully-accessible telecommunication system.

• Surveys

- The D/HH community needs hard, numerical data about itself. TDI is developing surveys to learn more about the types of relay service(s) they have, communication modalities, additional disabilities, income, education, etc.
- Traditionally we all rely on data from other entities

and interpret the results.

■ NASADHH can help us by sharing our surveys and polls with your local communities. The more data we have, the better our policy proposals (or their lawsuits) may fare.

• TDI Blue Book -- TDIBlueBook.com

- All the Commissions for D/HH are already listed in TDI Blue Book, as well as their regional offices, contact information, social media sites, etc.
- It's a true D/HH ecosystem directory of organizations, deaf-owned businesses, deaf and mainstream schools, agencies, etc.
- Open to everyone -- free to register and use.
- Completely self-manageable.

■ NASADHH can help us by claiming your listing at <https://tdibluebook.com/a/nasadhh>, and encouraging the Commissions to claim their respective listings too.

■ Use a team email account, e.g. info@TDIforAccess.org when registering to claim your listing.



www.TDIforAccess.org

Shaping an Accessible World

Transition and 2021 FCC Priorities for Communications Accessibility

As the U.S. navigates the challenges of rounding the corner on the COVID-19 pandemic, recovering from economic devastation, and pursuing racial justice, the FCC can play a key role in ensuring that people with disabilities can take part in building back better on equal terms.

Prioritize Accessibility in Agency Leadership

Fulfilling the FCC's role in ensuring equal access to communications and technology for people with disabilities requires a proven leader with a strong accessibility track record.

What the Transition can do:

- Vet candidates' [for FCC Chairperson] historical approach to accessibility issues and ensure that a new Chair has a demonstrated commitment to accessibility.
- Relocate the Disability Rights Office to a New Office of Civil Rights

The Disability Rights Office (DRO), which leads many of the Commission's disability policy initiatives, is situated in the Consumer and Governmental Affairs Bureau. This casts accessibility initiatives as customer service problems and limits intra-agency collaboration.

What the Commission can do: relocate DRO to a new Office of Civil Rights. Resituating DRO would better frame accessibility issues in terms of their civil rights dimensions and ensure that initiatives across the Commission reflect input from disability stakeholders.

COVID-19 Response—Address Video Conferencing Accessibility Problems

The pandemic has amplified the critical importance of videoconferencing for employment, education, healthcare, and basic communication. But many videoconferencing platforms fall short on accessibility, failing to fully implement closed captioning and other critical features. As a result, people with communications disabilities are being left further behind by the pandemic.

What the Commission can do:

- Resume its rulemaking on videoconferencing accessibility. The Commission should immediately resume its stalled 2011 rulemaking implementing the videoconferencing accessibility requirements of the Communications and Video Accessibility Act.²
- Require relay interconnection with videoconferencing services. Many users who are deaf or hard of hearing must separately join video conferences via relay, increasing complexity and cost. The Commission should improve the experience of deaf and hard of hearing users and reduce the impact on the TRS fund by requiring videoconferencing services to permit VRS and IP CTS services to directly interconnect.

Get the Real-Time Text Transition Back on Track

As TTYs phase out of use with the transition of phone networks to Internet Protocol (IP), support for Real-Time Text (RTT) is critical to ensure deaf and hard of hearing people can access basic communications. But the TTY-to-RTT transition has not proceeded smoothly, and RTT support remains missing from significant portions of the next-generation phone network.

What the Commission can do:

- Ensure wireless carriers and vendors of core network software develop and deploy RTT functionality, turning to enforcement if necessary.
- Require wireline RTT support and interoperability, including with 988 / N11 numbers.
- Require RTT support and address other accessibility issues in carceral facilities.³

Bolster Video Programming Accessibility

While the Commission has made progress over the past decade on the accessibility of video programming through provision of closed captions and audio description, critical

Continued on page 12

1. This document was developed by the Samuelson-Glushko Technology Law and Policy Clinic (TLPC) at Colorado Law and the Georgetown Communications and Technology Law Clinic (CTLC) in consultation with Telecommunications for the Deaf and Hard of Hearing, Inc. (TDI), the National Association of the Deaf (NAD), the American Council of the Blind (ACB), the Hearing Loss Association of America (HLAA), and the Technology Access Program (TAP) at Gallaudet University. Contact Blake Reid at blake.reid@colorado.edu with questions.

2. See Implementation of Section 716 and 717, Further Notice of Proposed Rulemaking, 26 FCC Rcd. 14,557, 14,684-85, ¶ 301 et seq. (Oct. 7, 2011).

3. Comments of HEARD, et al. (Nov. 23, 2020), <https://www.fcc.gov/ecfs/filing/1123290918519>.

KAIKA INTERVIEW Continued from page 11

gaps remain in the coverage and quality of captions and description, particularly on IP-based services. These problems have exacerbated difficulties with public health communications during the pandemic.

What the Commission can do:

- Proceed on pending consumer petitions to develop closed captioning quality metrics,⁴ and close loopholes in the Commission's rules,⁵ including the "third-party loophole."
- Launch a new rulemaking for to build on the Disability Advisory Committee's audio description quality item⁶ and inquire into description for IP-delivered programming.
- Address the accessibility of captioning and description interfaces.

Improve the Accessibility of Wireless Handsets

People with disabilities continue to depend on the Commission's oversight of the accessibility of wireless handsets.

What the Commission can do:

- Adopt the new ANSI C63.19 standards for smartphones, ensuring consumers have access to more wireless devices that are hearing aid compatible.
- Ensure that the wireless industry does not sunset telecoil connectivity until Bluetooth LE or other connectivity solutions have been widely deployed.
- Ensure that vendors continue to address the accessibility of feature phones, including those distributed under the Lifeline program.



4. Petition of Telecommunications for the Deaf and Hard of Hearing, Inc. (TDI), et al. (July 31, 2019), <https://www.fcc.gov/ecfs/filing/10801131063733>.

5. Petition of Telecommunications for the Deaf and Hard of Hearing, Inc. (TDI), et al. (January 26, 2011) <https://www.fcc.gov/ecfs/filing/6016167106>.

6. Recommendation of the DAC (Oct. 14, 2020), <https://www.fcc.gov/file/19830/download>.

How to Contact FCC:

1-888-225-5322 Voice: toll-free

1-888-835-5322 TTY: toll-free

1-844-432-2275 or 202-810-0444 ASL: via VP

1-866-418-0232 FAX: toll-free

FCC Hours are:

10:00 AM to 5:30 PM Eastern Time

Monday to Friday

To write a letter, send to:

Federal Communications Commission

445 12th Street, SW

Washington, DC 20554

More contact information is available at:

<http://www.fcc.gov/contact-us>



The Biden Plan for Full Participation and Equality for People with Disabilities

Joe Biden believes that everyone should be treated with dignity and have a fair shot at getting ahead. This year, on July 26, we will mark the 30th anniversary of the Americans with Disabilities Act (ADA). Thanks to the leadership of people with disabilities, disability advocates, and their allies, we have made progress towards the goals of this law—“equality of opportunity, full participation, independent living, and economic self-sufficiency” for people with disabilities. But, there is much more work to do in order to ensure that all people with disabilities are able to participate fully in our communities and enjoy the same kinds of choices and opportunities that many Americans take for granted.

At the beginning of the Obama-Biden Administration, our country faced a significant economic downturn, and President Obama tapped Vice President Biden to implement a stimulus package to improve our economy and the financial well-being of millions of Americans. Today, our country is once again facing enormous economic challenges, brought on by the pandemic and the impact it is having on businesses and workers across the globe. As President, Biden will lead an effort to rebuild our economy. He will build an economy that is more inclusive, more just, and more accessible for millions of Americans with disabilities and their families.

Biden will work with the disability community to build a stronger, more expansive middle class so that everyone—regardless of race, gender, religion, sexual orientation, or disability—can find a place. That means amending our laws, policies, and culture to ensure full inclusion of the 61 million individuals with disabilities in the United States in all parts of our society. Biden will prioritize enacting and implementing policies that break down the barriers to access for people with disabilities living and succeeding in their chosen communities, which means good jobs in competitive, integrated employment; affordable, accessible, and integrated housing; accessible and affordable transportation; inclusive voting processes; and any needed long-term services and supports.

President Trump and Republicans in Congress have attempted to repeal Obamacare, the landmark law that protected health care coverage for 100 million Americans with preexisting conditions, including people with disabilities; to undermine the ADA, including by making it harder for people with disabilities to file claims; and to fundamentally restructure the Medicaid and Supplemental

Security Income programs which directly benefit people with disabilities. As President, Biden will reverse the damage done by Trump’s presidency, fight efforts to weaken the civil rights of all Americans, and work diligently with Congress and the disability community to expand access to needed services.

Biden recognizes that we need to view all policies—ranging from climate change and the economy to education and housing—through an inclusive lens. He will ensure people with disabilities have a voice in their government and are included in policy development and implementation.

To accomplish these goals, as President, Biden will:

- Ensure full inclusion of people with disabilities in policy development and aggressively enforce the civil rights of people with disabilities.
- Guarantee access to high-quality, affordable health care, including mental health care, and expand access to home and community-based services and long-term services and supports in the most integrated setting appropriate to each person’s needs and based on self-determination.
- Expand competitive, integrated employment opportunities for people with disabilities.
- Protect and strengthen economic security for people with disabilities.
- Ensure that students with disabilities have access to educational programs and support they need to succeed, from early interventions to post-secondary education.
- Expand access to accessible, integrated, and affordable housing, transportation, and assistive technologies and protect people with disabilities in emergencies.
- Advance global disability rights.

ENSURE FULL INCLUSION OF PEOPLE WITH DISABILITIES IN POLICY DEVELOPMENT AND AGGRESSIVELY ENFORCE THE CIVIL RIGHTS OF PEOPLE WITH DISABILITIES

Throughout his career, Biden has fought for the rights and opportunities of people with disabilities—working

BIDEN PLAN Continued from page 13

to pass anti-discrimination protections in the Americans with Disabilities Act, the Rehabilitation Act of 1973, the Fair Housing Amendments Act of 1988, the original Individuals with Disabilities Education Act in 1975, and the Affordable Care Act in 2010. As President, Biden will make sure these protections are fully enforced and that people with disabilities have a voice in policy development and implementation. As President, Biden will:

- **Ensure people with disabilities are included in policy development by creating a senior position in the White House dedicated to disability community engagement and policy coordination.** Biden will appoint a director of disability policy within the Domestic Policy Council to ensure that these issues receive the attention they deserve at the highest levels of government and are integrated in broader policy discussions. This senior White House official will also engage with a variety of disability stakeholders, including disability community leaders, representatives from disability organizations, and people with disabilities and their family members. The position will ensure that the Administration is getting diverse perspectives and that policy is being developed, implemented, and evaluated with input from people with disabilities. In addition, Biden will ensure senior leaders across federal agencies, including in the Departments of Health and Human Services, Education, Labor, Housing and Urban Development, Transportation, State, and Justice, and the Consumer Financial Protection Bureau, share his commitment to breaking down the barriers that hold back people with disabilities. Biden will identify and aggressively recruit qualified people with disabilities to fill leadership positions across the Administration, not merely those positions that relate to disability programs and policies.

(TDI: text omitted)

- **Ensure our criminal justice system treats people with disabilities fairly.** Biden will fund initiatives to partner mental health, disability, and substance use disorder experts and social workers with police departments and first responders. These service providers will train police officers and other frontline responders to better de-escalate interactions with people in severe emotional distress and to respectfully and appropriately interact with individuals with disabilities. The training will vary and be specific to the needs of each impacted community, differentiating strategies for the mental health community and the disability community. Biden will also

appoint Justice Department leadership that will prioritize the role of using pattern-or-practice investigations to strengthen our justice system, under authority in legislation spearheaded by Biden as Senator. And, Biden will ensure greater enforcement of the ADA across the justice system so that people with disabilities are not denied accommodations whether they are victims, defendants, or witnesses. In addition, he will get people who should be supported with social services—instead of in our prisons—connected to the help they need. He will expand access to voluntary, community-based mental health and substance use disorder treatment, as well as educational opportunities and job training for people during and after incarceration. He will also ensure that young people with disabilities who are incarcerated receive accommodations for their education. Read Biden's full plan on strengthening America's commitment to justice at <https://joebiden.com/justice/>.

- **Fully implement the Help America Vote Act, including the section championed by Biden requiring that voting systems be accessible for people with disabilities.** Biden will also work to pass the Accessible Voting Act, which will require states and localities to provide accessible voting information, training for poll workers, and accommodations for older adults and voters with disabilities. And, he will make sure every vote counts by ending discriminatory state voter identification laws, and promoting automatic voter registration, same-day voter registration, curbside voting, e-mail registration, voting by mail, and early voting.

(TDI: text omitted)

GUARANTEE ACCESS TO HIGH-QUALITY, AFFORDABLE HEALTH CARE, INCLUDING MENTAL HEALTH CARE, AND EXPAND ACCESS TO HOME AND COMMUNITY-BASED SERVICES AND LONG-TERM SERVICES AND SUPPORTS

Today, the Affordable Care Act (ACA) is still a big deal—especially for people with disabilities. Because of Obamacare, over 100 million people no longer have to worry that an insurance company will deny them coverage or charge them higher premiums just because they have a pre-existing condition—such as a disability. Insurance companies can no longer set annual or lifetime limits on coverage, which is especially critical for people with disabilities. But we have much more to do to expand access to high-quality, affordable health care and to long-term services and support in the

BIDEN PLAN Continued from page 14

most integrated setting appropriate to each person's needs.

(TDI: text omitted)

Ensure non-discrimination in access to health care. Biden will defend the rights of all people to have access to quality, affordable, and accessible health care free from discrimination by ensuring that health care non-discrimination protections are fully enforced. His HHS Office for Civil Rights will issue guidance for states and health insurance programs clarifying how the ADA applies to benefits and reimbursement decisions. Also, as directed by Section 1557 of the Affordable Care Act and Section 504 of the Rehabilitation Act, Biden will ensure that entities funded by HHS do not deny medical care based on disability or age.

(TDI: text omitted)

EXPAND COMPETITIVE, INTEGRATED EMPLOYMENT OPPORTUNITIES FOR PEOPLE WITH DISABILITIES

Workers with disabilities deserve equal employment opportunities as well as a powerful commitment from the federal government to break down barriers, like discrimination, that keep them from seeking, getting, and keeping jobs in competitive, integrated employment. Biden has made that commitment throughout his career and, as President, he will continue to fight to help workers with disabilities find jobs that secure their place in the middle class. Biden's commitment extends to LGBTQ+ Americans with disabilities and people of color with disabilities who, because of their race or sexual orientation, may face unique and especially difficult economic challenges. Biden will enforce the ADA to ensure that employers do not discriminate against people with disabilities, and provide reasonable accommodations for them to succeed at work. He also will:

Safeguard workers with disabilities' rights to workplace accommodations and equal employment opportunity.

In 2019, fewer than one in five people with disabilities were employed, and workers with disabilities in every age group were less likely to be employed than workers without disabilities. Biden will direct his Labor Department to work with the EEOC and the Justice Department to eliminate the discrimination that bars too many workers with disabilities from employment. This includes requiring employers to disclose whether they have successfully engaged in an "interactive process" with workers with disabilities to provide those workers with the accommodations they need to overcome barriers in the workplace and the job application process.

(TDI: text omitted)

EXPAND ACCESS TO ACCESSIBLE, INTEGRATED AND AFFORDABLE HOUSING, TRANSPORTATION, AND ASSISTIVE TECHNOLOGIES AND PROTECT PEOPLE WITH DISABILITIES IN EMERGENCIES

In order for people with disabilities to live independent lives in the community of their choice, Biden will expand access to accessible, integrated, and affordable housing and accessible transportation. His administration will support the development of new assistive technologies and expand access to them in the classroom, at home, and at work. And he will ensure that our emergency response systems take into account the needs of people with disabilities.

(TDI: text omitted)

Promote universal design and affordable, accessible public and private transportation. People with disabilities, including people with mobility, developmental, and sensory disabilities, must have accessible transportation in order to live, attend school, work, or shop; access health care; and participate in the community. Biden has proposed a comprehensive infrastructure plan which will increase flexible federal investments, help cities and towns install light rail networks, and improve existing transit and bus lines. And, he will create a new program that gives rapidly expanding communities the resources to build in public transit options from the start. Whether improving existing systems or creating new public transit options, those systems will be accessible to all people with disabilities and people with disabilities will be included in the design and implementation of those systems. In addition, he will:

- Implement policies to address barriers to accessible transportation. All too often public transit fails to comply with ADA. Biden will increase federal funding to increase accessible transportation and expand services to better meet the needs of all residents including the needs of travelers with disabilities.
- Ensure new modes of transportation use universal design and incorporate the needs of people with disabilities. As new innovations are developed—including autonomous vehicles and on-demand transportation—Biden will create both guidance and incentives for researchers, scientists, venture capitalists, and all entrepreneurs to include people with disabilities from the beginning to ensure accessibility.
- Ensure that air travel is accessible to people with

Continued on page 16

BIDEN PLAN Continued from page 15

disabilities. Biden will work to pass the Air Carrier Access Amendments Act to ensure that airline carriers do not discriminate against people with disabilities, improving the enforcement of the Air Carrier Access Act (ACAA), which prohibits discrimination by airlines with respect to travelers with disabilities. This includes ensuring individual video systems on airlines are open and closed caption ready and have the option of picture-in-picture American Sign Language as a language option. In addition, he will also ensure that people with disabilities can receive compensation when disability equipment, including wheelchairs, are lost or damaged by transportation carriers.

- Improve paratransit services. Biden will create a pilot program with transit agencies that will address transportation challenges in paratransit services as called for in the Disability Access to Transportation Act. Biden will also work to end long wait times in processing applicants for paratransit services and ensure that riders who receive paratransit services in one jurisdiction can be eligible for the services in another jurisdiction.

Provide assistive technologies to people with disabilities at home, at school, and at work. Assistive technologies make it possible for people with disabilities and older adults to remain in their homes and live in their neighborhoods. As President, Biden will partner with Congress and the disability community to expand access to assistive technologies at home, at school, and at work. Biden will work with Congress to pass the Assistive Technology Act (ATA), which will expand the nationwide but seriously underfunded state assistive technology programs and ensure they are connected to programs that reach all people with disabilities. Biden will call for a new Assistive Technology Innovation Fund administered by the Department of Commerce to create public-private partnerships focused on creating new technologies to increase the independence of people with disabilities. Biden will fully enforce Section 508 of the Rehabilitation Act, which ensures that the information and communication technology that federal agencies create or obtain (including by federal procurement) must be accessible and reflect the needs of people with varying types of disabilities. He will take into account the needs of the disability community when strengthening and enforcing data privacy protections. He will also provide incentives to employers to develop and obtain more assistive technology to help create more inclusive workplaces, and support Department of Education initiatives to encourage schools to

use innovative technology to assist students with disabilities.

Increase access to the internet. According to a Pew Research Center survey, “[d]isabled Americans are about three times as likely as those without a disability to say they never go online.” And, adults with disabilities younger than 65 are less likely to have broadband at home than adults without a disability. Biden will fully implement and enforce the 21st Century Communications and Video Accessibility Act (CVAA), which President Obama signed into law in 2010, to expand accessibility for people with disabilities in telecommunications and video programming. He will also expand access to broadband. As President, Biden will invest \$20 billion in rural broadband infrastructure; direct the federal government to support cities and towns that want to build municipally-owned broadband networks, and increase funding for states to expand broadband by passing the Digital Equity Act to help communities tackle the digital divide.

Protect people with disabilities in emergencies. The Obama-Biden Administration prioritized whole community readiness and built a national disability inclusive approach to emergency preparedness and disaster response, recovery, and mitigation. As President, Biden will secure passage of the REAADI for Disasters Act, which will ensure older adults and people with disabilities have a strong voice in the planning for disasters and that shelters and recovery services are accessible to all, and the Disaster Relief Medicaid (DRM) Act, which will make it possible for people who depend on Medicaid and must move out of state because of a disaster to continue to receive Medicaid. He will also ensure that FEMA is prepared for concurrent emergencies that may disproportionately affect older Americans and people with disabilities.

Editor note: Publishing of the Biden Plan is for informative purposes only. TDI has omitted sections that do not necessarily apply to TDI’s mission. The following article, “Consumer Groups meet with Biden-Harris Transition Team” highlights our responses to the Biden Plan.

Read President Biden’s full plan at: <https://joebiden.com/disabilities> and his plan to support people with disabilities during the COVID-19 Pandemic at: <https://joebiden.com/covid19-disabilities>

Consumer Groups meet with Biden-Harris Transition Team

On January 13th, 2021, representatives from the Biden-Harris transition team held a round table event with various organizations representing the Deaf and Hard of Hearing community.

Moderated by Claudia Gordon and Howard Rosenblum, the following organizations were invited: CPADO, NDBA, Deaf/Hard of Hearing In Government, DSA, ALDA, AADB, NASADHH, and council de manos. (editor note: apologies if we missed other organizations, as there were many in attendance.)

Each organization was given about 5 minutes to share their pressing issues and concerns for the White House leadership to consider as they push forward the President's policy. The following is what TDI shared with the meeting attendees:

TDI greatly appreciates the well-written Biden Plan for Full Participation and Equality for People with Disabilities. We want to bring the Biden-Harris team's awareness regarding the accessibility of communication and media technologies and the role of administration and its appointees to the Federal Communications Commission and other agencies in ensuring the future of relay services, closed captioning, and other critical digital accessibility priorities.

2020 greatly changed the way we communicate, as tens of millions of Americans who are deaf or hard of hearing increasingly rely on video conferencing and non-interconnected VoIP services like Zoom and Skype that remain fraught with accessibility barriers, including missing captions and ASL interpretation.

The pandemic also underscored long-standing challenges with access to video programming, as Americans stuck at home under quarantine and stay-at-home orders increasingly relied on news programming for public health and emergency information with poor-quality captions and user interfaces that continue to obscure the availability and customization of captions. And the ever-increasing array of internet of things devices for the home changed how we live, but often left deaf and hard of hearing people behind as virtual assistants without screens became a dominant paradigm.

We are concerned that the deaf and hard of hearing people are quickly getting left out of these technological advances as fast as these technologies advance.

We applaud previous leaders for their foresight and creation of the:

- Accessibility provisions of the Television Decoder Circuitry Act, the Telecommunications Act of 1996, and the Twenty-First Century Communications and Video Accessibility Act of 2010
- Section 504 and 508 of the Rehabilitation Act, and
- The various provisions of the Americans with Disability Act that bear on digital accessibility, including the creation of the telecommunications relay service.

We request the Biden-Harris administration, in their efforts to unite this country, address racial inequity and bring the pandemic under control, and make people who are deaf or hard of hearing part of the effort to build back better.

Biden-Harris can also encourage legislative and federal agencies to:

- Engage and employ people with disabilities in the administration and prioritize accessibility in all the government's efforts.
- At the FCC, relocate the Disability Rights Office to a new Office of Civil Rights.
- Expand the scope of the CVAA to include videoconferencing accessibility, including relay interconnection.
- Ensure all video programming whether on TV, the internet, on the plane, or in my smart car — all have closed captioning and audio description.
- Address the continuing challenges of hearing aid compatibility with smartphones.

We've outlined more suggestions in two documents (attached) previously shared with the transition team:

- The DHHCAN Policy Proposals, and
- The 2021 FCC Priorities for Communications Accessibility

TDI is convinced the Biden-Harris team has the compassion to make Americans thrive, and it begins with ensuring people with disabilities have the same access to a better future. If there are no barriers for PWD, there are no barriers for success — for everyone.

Thank you to our 2020 Sponsors!

facebook  *Ultratec*
verizon 



Thank you to our 2020 Donors!

Marty and Holly Armato	Ira and Jackie Gerlis	Murray and Anjali Margolin	Frederick Schatz
Stephanie Aronson-Hightman	Ross and Selina Gilson	John Mathews	Helena Schmitt
Lloyd Ballinger	Barbara Goettsch-Mathis	Taylor Mayer and Debbie Patkin	Bob and Eileen Seremeth
Paul Bayba	Libby Goldstein	Eileen McCartin	Therese Shellabarger
Suzy Bedrosian	Aaron and Della Gorelick	Olin and Sanremi Miers	Joel Silberstein
Patricia Beech	Ernest and Mencie Hairston	Mark Mindlin	Ausma Smits
Robert Blumenau	Dixie Ziegler	Elaine B Monaghan	Richard Smrz
Mary and Sherwood Boxer	Judy Harkins	Matt and Ana Myrick	Al Sonnenstrahl
Judy and Phil Bravin	Bob and Evie Harris	Rachel Naiman	Sam and Majorie Sonnenstrahl
<i>Contribution is in honor of Claude Stout's retirement and in honor of Eric Kaika as CEO.</i>	Ron and Kay Hirano	Danny and Diane Newkirk	Ronald Sperry
Dot Brenner	Pam Holmes	Ron and Melvia Nomeland	Claude and Judy Stout
Raymond Brown	Steve and Beth Holst	John Olver	Kevin Struxness
Kevin Colwell	Jesse David Isaac	Genie Ott	Peggy Sugiyama
Terry Conley	Vilas Johnson	Jana Owen	<i>In memory of William Sugiyama</i>
Rodney and Vicki Danco	Rae Johnson	Marion and Jeannie Parris	Ron Sutcliffe
Bob Davila	Sara Johnston	Karen Peltz-Strauss	Steve Swomley
Tom and Shirley Desrosier	I. King Jordan	Scott Strauss	Chuck Theel
Lorenzo and Janice DiMarco	Kazimiera Kaminski	James Perry	Lillian Tompkins
Alok Doshi	Jim Kane	David and Jacqueline Peterson	Carol Trachtenberg
Tom and Laurie Dowling	Charlotte Karras	Helen Peterson	Ernest and Brenda Tracy
Joe and Meg Duarte	William Kendall	Donna Platt	Frank Turk
Don and Vicki Ensor	Marcia Kolander	James and Kathy Potter	Gregg and Kate Vanderheiden
Larry Evans and Betty Bounds	Donald Kovacic	Janet and Paul Pyers	Christian Vogler and Krystallo Tziallila
Barbara Fairwood	Michael Kramer	Mary Jenn Raines	Daryl Wallace
Steven Frank and Ed Knight	Becky Ladew	Janice Richmond	Mary Ann Weeks
Fred and Constance Friedman	Kim Lenzen	Anna Maria Rinaldi	Bob Weinstock and Judy Mounty
Jack and Rosalyn Gannon	Richard Leshner	Robert Robbio	Roy and Carrie White
Laura Moy	Jeff Liebman	Andrea Saks	Betty Witczak
	Joan Liebman	Jacob Salem	Sze-ya Yeh
	James and Ginny Lindsay	Debby Sampson	
	Karen Lynch	Nancy Sanders	



TDI In Action

September – December 2020

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 SERVICE

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

■ (Nov 5) HLAA, TDI, NAD, ALDA, CPADO, DSA, DHH-RERC and IT-RERC filed comments on Amendment to Application of ClearCaptions for Certification as a Provider of IP Captioned Telephone Service.

We are concerned about the Commission's approach of blessing 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.

The Commission continues to place the cart before the horse in approving ASR-based applications, turning them loose on consumers in the hopes that problems with quality, privacy, and 911 connectivity will not result in serious harm. We

share alarm over "studies [showing] that speech recognition services make far more errors when transcribing the speech of people of color than of white people. The rules of the road for ASR-based IP CTS remain unclear.

Nevertheless, we appreciate ClearCaptions's good faith willingness to engage on the record with Consumer Groups' and accessibility researchers' questions about the ClearCaptions application. Our questions relate to quality, call volume, and privacy. For a full list of questions and ClearCaptions's answer, refer to the filing at the link below.

<https://ecfsapi.fcc.gov/file/11061859912255/2020.11.05%20Consumer%20Groups%20and%20Accessibility%20Researchers%20ClearCaptions%20Comment%20final.pdf>

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



TDI In Action September – December 2020

Continued from page 20

■ (Dec 21) HLAA, TDI, NAD, ALDA, CPADO, DSA, NCSA, DHH-RERC and IT-RERC filed comments on Application of CaptionCall to Expand Its IP Captioned Telephone Service

We again state our concern about the Commission's approach of blessing 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.

It appears that the industry is now following the Commission's invitation to begin shifting their operations toward ASR technologies, but the rules of the road for ASRbased IP CTS remain unclear. It remains unclear when or how the Bureau will evaluate ASR applications, or how the Bureau's oversight of the conditionally certified applications will unfurl in the midst of the chaos of the COVID-19 pandemic, or how the ultimate adoption of metrics will affect the conditional certifications of ASR-based offerings.

The Commission should also consider the strikingly similar views of CaptionCall from earlier this year. CaptionCall urged the Commission to "adopt service-quality and ASR-specific mandatory minimum standards before certifying any ASR-only/hybrid providers" in objecting to InnoCaption's application.

Nevertheless, we appreciate CaptionCall's good faith willingness to engage on the record with Consumer Groups' and accessibility researchers' questions about the CaptionCall application. Our questions relate to quality, call volume, and privacy. For a full list of questions and CaptionCall's answer, refer to the filing at the link below.

<https://ecfsapi.fcc.gov/file/1221255600704/2020.12.21%20Consumer%20Groups%20and%20Accessibility%20Researchers%20CaptionCall%20Comment%20final.pdf>

ADVANCED COMMUNICATION SERVICES

Petition For Rulemaking To Update The Commission's Rules For Access To Support The Transition From TTY To Real-Time Text Technology, And Petition For Waiver

Of Rules Requiring Support Of TTY Technology • CG Docket No. 15-178;

Transition from TTY to Real-Time Text Technology • CG Docket No. 16-145

■ (Sept 8) TDI, NAD, GU-TAP along with TDI's legal representations at GT-CLTC and CL-TLPC submitted comments, filed ex-parte, urging the Commission to use the full weight of its authority to quickly facilitate Real-Time Text (RTT) support on IP-based networks.

The CCA's petition asks for an open-ended deadline for compliance and offers varying reasons for its members inability to meet the June 30, 2020 deadline, which we find unacceptable as grounds for a waiver.

We reminded the Commission that carriers have had multiple years to plan for and implement RTT on a timeline that they proposed. Pandemic delays alone cannot explain some carriers' inability even to offer a projected date of compliance. If the Commission declines to penalize carriers at this time, it should at a minimum set a date certain for full compliance by currently noncompliant carriers. We emphasized that even a 6-month delay is unacceptable and unfortunate, but acknowledged US Cellular's commitment to provide support for RTT services by Dec. 31, 2020.

<https://ecfsapi.fcc.gov/file/1090867176957/2020.09.08%20Consumer%20Groups%20RTT%20Waiver%20Ex%20Parte%20final.pdf>

Transition from TTY to Real-Time Text Technology • CG Docket No. 16-145

TDI IN ACTION Continued on page 22





TDI In Action

September – December 2020

Continued from page 21

■ (Nov 4) TDI, GU-TAP along with TDI's legal representations at GT-CLTC and CL-TLPC submitted comments, filed ex-parte, urging the Commission to use the full weight of its authority to quickly facilitate Real-Time Text (RTT) support on IP-based networks.

We emphasized that we have not seen any persuasive justification for the ongoing noncompliance from the members of Competitive Carriers Association (CCA). We noted that U.S. Cellular, although late to comply, has now come into full compliance and is no longer seeking a waiver. This underscores the fact that it is possible to comply with the rules.

We reiterated that under no circumstances should the Commission grant non-compliant carriers an indefinite waiver to implement RTT technology on their networks. The compliance deadlines were defined—with the carriers' input and assent—years ago, and those deadlines came and went months ago. 9-1-1 remains inaccessible for many consumers.

In our September 8 filing in the above docket, we urged the Commission to prepare to use its authority to fine carriers who do not comply with the Commission's Real-Time Text (RTT) implementation requirement. We reminded the Commission that carriers have had multiple years to plan for and implement RTT on a timeline that they proposed. We now emphasize that the reasons necessitating an extension put forth by CCA and its members do not justify the extension, as explained above. We again urge the Commission to:

- Set a hard deadline for carriers to come into compliance with providing RTT services;
- Announce that carriers that fail to come into compliance within the required timeframe will be subject to punitive fines; and
- Clarify that alternatives to RTT such as IP Relay are merely stopgaps and will not be considered an adequate substitute for obligations to provide access to emergency services for people who are deaf, hard of hearing, or DeafBlind.

OTHER

Rates for Interstate Inmate Calling Services : WC Docket No. 12-375

■ (Nov 23) HEARD, TDI, NAD, HLAA, NDRN, ALDA, CPADO, DSA, NCSA, CueSign, ADARA, CCASDHH, DHH-REC, and IT-RERC submitted comments to the FCC about how people who require communication accommodations are unjustly oppressed in prisons.

Inmate calling services (ICS) providers and prison officials often refuse to provide access to telecommunications services and equipment. People who require communication accommodations must be allowed to use the relay and telecommunications equipment at no cost. Many prisons still only provide TTYs as the only option, an obsolete divide that either does not work or unable to connect to outside parties. The Commission must act now to address communications accessibility for incarcerated people with communications disabilities.



Find TDI on Facebook!

www.facebook.com/TDIForAccess



TDI In Action

September – December 2020

Continued from page 22

We encourage the Commission to update its rules and require VRS, CTS, RTT, and other modern accessible communications services and associated equipment.

The Commission must ensure that carceral facilities and ICS providers can no longer deny incarcerated people who use American Sign Language, other sign languages, or rely on captioning or other modalities of relay service the ability to connect loved ones on the functionally equivalent terms demanded by the Americans with Disabilities Act. As part of this effort, the Commission must adopt rules for wireline

RTT support and amend its enterprise prohibition for IP CTS to allow its use in the context of carceral facilities.

The Commission must collaborate with the Department of Justice (DOJ), the Department of Homeland Security, the Federal Bureau of Prisons, and other state and local agencies with oversight over carceral facility operations to ensure equal access for incarcerated people with communications disabilities, including those with additional disabilities.

<https://ecfsapi.fcc.gov/file/1123290918519/2020.11.23%20Accessibility%20Coalition%20Carceral%20Communications%20Comments%20final.pdf>



TDI has launched a community survey to better understand deaf and hard of people's communication access in telecommunications, media, technology, and emergency communications. We encourage all people deaf, hard of hearing, late-deafened, and deaf+ aged 18 and over to respond.

The survey should only require 5 to 10 minutes to complete. You can find the survey here: surveymonkey.com/r/TDI_TechAccess_Survey2021

Participants who complete the survey can enroll in a drawing for a \$10 Amazon gift card. Five individuals will be randomly drawn. Odds of winning a gift card depend on the total number of individuals enrolling in the drawing.

TDI Releases D/HH Communication Access Survey



More info at tdiforaccess.org/survey/



24th Biennial Conference

Mon

Tue

Wed

Thu

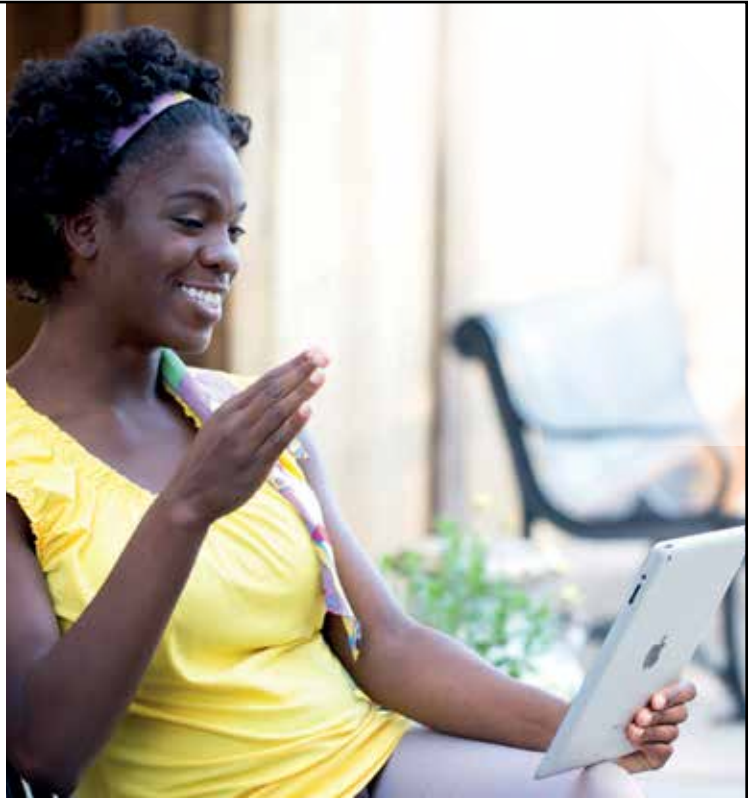
Reset and Reconnect

Virtual,
Watch/Register
at
TDIConf.com

2021
July
26 - 29

For details, contact:
PubRel@TDIForAccess.org





Join the Heartbeat of Communication

Experience the best possible VRS with easy-to-use, cutting-edge technology. Enjoy the clearest video, greatest features, and highest-quality SVRS interpreters available!

Sign up today at svrs.com/apply or download our app at



Connecting **Life**



© 2020 Sorenson Communications, LLC. If you choose Sorenson as your default provider, you can port your existing 10-digit number to Sorenson from another provider or Sorenson can provide you with one for the geographic area where you live or work. If you later change your default provider, you can port your number to that provider. When selecting Sorenson, you must provide to Sorenson the physical address (i.e., the Registered Location) from which you are placing the call, so that Sorenson can properly route any 911 calls you may make. If you move or change your location, you must notify Sorenson immediately. You can update your Registered Location from your Sorenson videophone by calling 800-659-4810 or by visiting www.svrs.com/moving. Sorenson will confirm receipt of your Registered Location information. Emergency calls made via internet-based TRS may not function the same as traditional E911 service. For example, you may not be able to dial 911 if there is an internet-service failure or if you lose electrical power, and your 911 call may not be routed correctly if you have not updated your Registered Location. For more information on the process of obtaining 10-digit numbers and the limitations and risks associated with using Sorenson's VRS to place a 911 call, please visit Sorenson's website: www.sorenson.com/disclaimer. For more information on toll-free numbering, please visit www.svrs.com/tollfree.

CONNECTING MADE EASY

Whether it's voice or text,
from across the street or
across the country, you can
rely on Ultratec technology
to keep you connected.



All your telephone needs:
TTYs & captioned telephones

Ultratec

www.ultratec.com

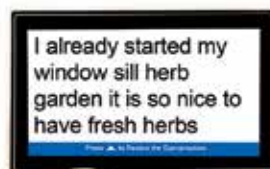
1-800-482-2424 (V/TTY)

service@ultratec.com



CapTel 2400i
includes Bluetooth®
wireless technology

CAPTEL® CAPTIONED TELEPHONES THAT FIT YOUR LIFESTYLE.



Low Vision Model
CapTel 880i



Traditional Model
CapTel 840i

FEDERAL LAW PROHIBITS ANYONE BUT REGISTERED USERS WITH HEARING LOSS FROM USING INTERNET PROTOCOL (IP) CAPTIONED TELEPHONES WITH THE CAPTIONS TURNED ON. IP Captioned Telephone Service may use a live operator. The operator generates captions of what the other party to the call says. These captions are then sent to your phone. There is a cost for each minute of captions generated, paid from a federally administered fund. No cost is passed on to the CapTel user for using the service. CapTel captioning service is intended exclusively for individuals with hearing loss. CapTel® is a registered trademark of Ultratec, Inc. The Bluetooth® word mark and logos are registered trademarks owned by Bluetooth SIG, Inc. and any use of such marks by Ultratec, Inc. is under license. (v2.6.10-19)

