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WHAT WE DO
“TDI shapes the Nation’s public policies in Information and Communications Technology (ICT) to advance the interests of the 48 million Americans who are deaf, hard of hearing, late-deafened, deafblind, and deaf with mobility issues.”

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Sorenson VRS, inside back cover • Ultratec, back page
Aim High and Execute Well

TDI is “the little engine that could,” whose influence far exceeds its small size. But given the fact our technological landscape is literally growing and shifting before our eyes, constantly threatening to leave individuals who are Deaf, Hard of Hearing, DeafBlind, Late-Deafened, Deaf with other disabilities, and individuals with communication disabilities behind, this little engine cannot afford to rest and lose its focus.

Several factors are critical to TDI’s ability to maintain its focus and to persist in the face of such challenges, but one particularly important element is strategic planning. All successful organizations are characterized by the clarity of their vision, mission, well-defined objectives and key results, and capacity to measure their progress. Equally important, these organizations are able to communicate to their stakeholders their strategic vision and plan to keep them meaningfully engaged in their progress toward successful outcomes.

An excellent example of the value strategic planning brings to an organization is the transition in TDI’s leadership in the spring and summer of 2020. Due to the strategic thinking and careful planning of Claude Stout, TDI’s CEO Emeritus, and Eric Kaika, TDI’s current CEO, the transition in leadership has been gratifyingly smooth, even with the unexpected COVID-19 pandemic. And Eric’s deep knowledge of operational resources and innovative thinking have enabled TDI to now operate digitally at so many levels, resulting in cost savings, increased efficiency, and greater reach.

TDI’s Board of Directors just completed the development of a strategic plan for the period of July 2021 to June 2023, building on Eric’s recent accomplishments and wonderful vision for TDI which you can read about elsewhere in this issue. I am deeply grateful to Fred Weiner, who previously served as a TDI Board member for 12 years, for facilitating the Board’s strategic plan development process. Weiner noted, “With a new CEO at the helm during a time of unprecedented change, the opportunity is ripe for TDI to channel that revitalized energy to reshape its destiny for the benefit of various stakeholders. TDI has a special place in my heart and it has been a tremendous pleasure working with such a dynamic and talented group.”

With TDI’s new strategic plan, you will have a much better sense of what TDI does, the value TDI brings to all the stakeholders, and where TDI is heading in the next couple of years. And I hope you will gain an appreciation for the opportunities we together have to shape an increasingly accessible world in Information and Communications Technology!

To learn more about TDI’s 2021-2023 Strategic Plan, go to the TDI website and find it in the top right.

Our Quest for Access

By Eric Kaika
Managing Editor

“TDI’s Vision Remains a Bold One: to shape an accessible world.”

When I was appointed the CEO of TDI, I drafted a visionary plan for TDI and shared it with the Board of Directors.

The document served multiple purposes, to remind us of TDI’s existing mission and vision statements, snapshots of various applications and platforms TDI utilizes for operations, and clearly defining each of TDI’s programs in plain language.

While most of the information was common knowledge for the Directors, it provided a clear map of how TDI is currently operating, its strengths and areas of improvement. We needed a clear, actionable and measurable plan to ensure TDI remains relevant in this rapidly changing technological world.

There’s no question that there is a need for TDI.

Despite technological advancements, the convenience of relay services and having nearly 100% broadcast television programming captioned, there is still a huge disparity in the equitable access to information and especially with advancing communications. Additionally, DHH community members still struggle to receive the accommodations they need to access these technological communication platforms and services. Furthermore, we’re seeing more and more DHH youth and other members unaware of TDI’s value and necessity.

This internal discussion led to the new vision for TDI, how to reposition the organization, strengthen collaboration, to engage our members, and to create lasting policies that ensure all aspects of information and communication technologies, from the moment of creation – are built with accessibility at the beginning.

Starting with the CEO visionary document, parts of it is shared throughout this magazine, the Board built the framework for TDI’s three-year strategic plan. Officially Board approved in June 2021, this issue is designed to outline TDI’s entire vision and strategic plan for the next three years.

There will be a number of changes, as already evidenced with the new membership fees and online Blue Book, in the coming years to keep TDI’s programs and services operating at ongoing peak performance. We also want to share and clearly outline these changes for our deaf and hard of hearing community members to understand and know what to expect as we undergo this transition. The ultimate goal is to ensure TDI is inclusive of every deaf and hard of hearing person, that we well-represent the diversity of our community, and that each person has an equitable experience to information and communication technologies.

These improvements are designed with the framework of making sure all individuals and communities experience the world of information and communication technologies with the same ease of access, and inclusion resulting in full and equitable participation in society.

As you read through this issue and see TDI’s vision, you’ll find our core values evident throughout our programs. We are people-focused. TDI represents a diverse deaf and hard of hearing community seeking inclusiveness in equitable communications and technology through proactive communication and collaborative efforts.
Simplifying the Membership Process and Affordability

TDI’s membership structure has long been individual centric, largely designed for working class DHH households and senior citizens. This model was recognized a few years ago, and there was consensus to add a new tier for young adults. There was also an affiliate membership tier, though it was relatively unclear as to how organizations with varying operating budgets and structures benefited from having a TDI membership, other than being listed in the Blue Book.

At one point the model showed three different individual tiers, with two different fees (one-year, two-year) and one affiliate membership, also with two different fees. Recently it became clear that the ongoing membership model was quickly becoming complex and difficult to maintain.

Additionally, it made no sense to us to create varying fees for members, who are TDI’s best asset as a policy shaping organization. Successful organizations need their members’ stories to influence policy proposals, and with a strong membership body, the organization is able to collect accurate and measurable data.

With that in mind, we decided to simplify the membership model by creating a flat rate for the community – $25 annually for individuals.

For industry professionals involved in creating or developing accessibility technology, there's the Professional membership, which is $100 annually.

We also improved and defined the affiliate membership model.

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<tr>
<th>Affiliate Memberships</th>
<th>Annual Cost</th>
<th>Benefits</th>
</tr>
</thead>
<tbody>
<tr>
<td>Nonprofit / Government / Education</td>
<td>$75</td>
<td>• 3 Employees receive Individual Memberships</td>
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<tr>
<td></td>
<td></td>
<td>• Listing in Blue Book</td>
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<tr>
<td></td>
<td></td>
<td>• Discounts to advertising opportunities in all TDI publications</td>
</tr>
<tr>
<td>Small Business</td>
<td>$100</td>
<td>• 1 Employee receives Professional Membership</td>
</tr>
<tr>
<td>Annual revenue &lt;250K</td>
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<td>• Listing in Blue Book</td>
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<td>• Discounts to advertising opportunities in all TDI publications</td>
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<tr>
<td>Company</td>
<td>$250</td>
<td>• 2 Employees receive Professional Memberships</td>
</tr>
<tr>
<td>Annual revenue &gt;250K</td>
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<td>• Listing in Blue Book</td>
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<td>• Discounts to advertising opportunities in all TDI publications</td>
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<tr>
<td>Corporate</td>
<td>$500</td>
<td>• 4 Employees receive Professional Memberships</td>
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<td>Annual revenue &gt;500K</td>
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<td>• Listing in Blue Book</td>
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<td></td>
<td>• Discounts to advertising opportunities in all TDI publications</td>
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<tr>
<th>Regular Membership</th>
<th>Annual Cost</th>
<th>Benefits</th>
</tr>
</thead>
<tbody>
<tr>
<td>Individual</td>
<td>$25</td>
<td>Access to all TDI Publications</td>
</tr>
<tr>
<td></td>
<td></td>
<td>• Discounts to all TDI events and functions.</td>
</tr>
<tr>
<td>Professional</td>
<td>$100</td>
<td>All Individual Benefits, and</td>
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<tr>
<td></td>
<td></td>
<td>• Full access to online TDI Training Institute portal</td>
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<td></td>
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<td>• Priority Seating discount</td>
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These memberships can also be used to add-on to Affiliate members.

To learn more about the membership benefits, fees, and related programs, check out TDI’s Membership page at: tdiforaccess.org/membership
In 1968, TDI announced the debut of its first Blue Book, a three ring binder that was used to list home addresses and phone numbers of TTY users. Over the years, this seemingly humble binder picked up momentum and transformed into the iconic blue paperback version that millions have utilized to find information on deaf/hh businesses or individuals. As with any technological marvel that has outgrown its parameters, it's time for the Blue Book to be reinvented. Today's users demand information quickly, in clear format and easily accessible online.

As a leader of advancing technological products that increase accessibility, it makes sense for TDI to innovate their own product and transform it for the digital age. Many factors have played into this decision. Rising costs for printing, frequently increasing postage rates, and supporting enormous employee hours for contacting and confirming all existing and new TTY users have dictated our new direction for the bluebook. It is virtually impossible to keep everything updated in print now. Information on businesses that are no longer operating takes a year to be updated. It was not a hard decision to accept that the sheer time-consuming and cost-effective shortcomings of a printed Blue Book needed to be evaluated and adjusted accordingly.

The iconic phone book that we know so well by its blue hues has transformed into a digital network that connects our deaf and hard of hearing community. TDI has been the premier d/hh directory provider of our community for more than 5 decades. We honor this tradition by offering TDIBlueBook.com as a virtual source of all things deaf/hh.

TDI’s new online Blue Book is open to everyone. Registration, searching and listings are all free and encouraged. This allows TDI to focus on what really matters, an inventory of every deaf-owned business globally, listing of all the deaf schools, mainstream schools, and oral-approach schools. All this information is already out there but the bluebook will be the first to consolidate and concentrate online this important resource for our deaf/hh community into one main location online.

The heart of TDI’s Blue Book is a curated collection of businesses and individuals that feed our shared eco-systems. The online bluebook will be a treasure trove of information ongoing and updated easily. Actual numbers and facts about deaf/hh businesses and members can be gleaned through bluebook perusals. Policy amendments that TDI suggests can now be backed up with hard facts.

With the improved Blue Book, the deaf and hard of hearing individual is now empowered to make decisions that benefit our community. Whether looking for a carpenter or an auto mechanic, you can now search our bluebook database to see if there is a deaf-owned business offering that service near you. Parents who are searching for other options for their deaf/hh child can now search the Blue Book for alternative educational settings.

TDI is proud to have presented the first directory of TTY users and is honored to continue this tradition by offering our premier deaf/hh directory online.
Designing TDI Conferences to be Hybrid

TDI’s biennial conference, which happens every two years during odd numbered years, is one of our strongest programs. Vastly different from traditional conferences for deaf and hard of hearing people – it brings together federal policy makers, industry professionals, academia experts, and DHH consumers.

There is no other event that brings these distinct groups together to assess, discuss, and theorize accessibility accommodations for all deaf and hard of hearing Americans.

By design, TDI’s biennial conferences are nearly perfect. It creates actionable results, —fosters networking and collaboration, and its revenue stream is healthy. So the question became, how can we expand, by bringing more DHH consumers to the conference and ensuring we are diverse and inclusive?

The answer we came up with is to make the conference hybrid, keeping the in-person interaction while making the information shared accessible to all by virtual attendance. We can’t expect our community members to always fly in to participate in the conference.

By happenstance, the pandemic forced us to adopt a fully virtual conference model for the first time. Although delaying the hybrid concept until 2023, it gave us the opportunity to see how receptive the DHH community is toward attending a virtual conference. And by all accounts, the 2021 TDI Biennial conference was a success. Additionally, it provided us with a wealth of information and resources to ensure successful hybrid TDI conferences in the future.

Further, it allows us to implement an asynchronous approach. By having all conference programs recorded and streamed online, we are able to make all materials available for people to review at any time. Starting with the 2021 biennial conference, you can review all the discussion on our conference website: TDICnf.com/recordings

Unchanging is that TDI conferences will continue to be hosted in the metropolitan Washington DC area. The biggest reason for this decision is due to the fact that the majority of our attendees are policy makers, industry leaders and government representatives, who all primarily work around the DC/MD/VA area. This is not to say we aren’t focusing on our core membership. This is why we are creating and honing a hybrid model - to allow those from afar to still be able to tune in.

TDI is also permanently making its conference exhibition area, where industries showcase their products and are available for questions, free to the general public. We are continuing to look at ways to significantly reduce registration fees allowing attendees to access the information shared at our plenaries and forums. We want to make sure people are able to receive and participate in our conferences, whether in person or afar, and not have cost being a deterring factor.

Lastly, TDI will always host its conferences during the week of July 26. It was on that date, in 1990, the American with Disabilities Act was signed into law. ADA requires access to employment, telecommunications, and other aspects of daily life.
The Coming Transformation of TDI World

TDI World, the very magazine you are holding in your hands today, has been greeting you in your mailbox since 2007. After fifteen years, TDI World will transition from the traditional print and mail to an online media resource. Our last issue will be numbered 53.5, slated to be sent out in January of 2023. We will print 6 more issues covering: TDIConf12 highlights, 2021 and 2022 scholarship recipients, and a farewell review of prior TDI World magazines.

Similarly to the Blue Book, the importance of timing, having the most updated news, cost and member convenience influenced the decision for this digital leap forward. All the information you've gleaned from the magazines will still be widely available on TDI's website (TDIforAccess.org/ TDWorld).

“TDI in Action”, our quarterly summary of policy filings continuing its plain language format will add signing videos with captions, voiceover and transcripts. Featured stories will be available on-demand, found throughout our website: TDIforAccess.org.

The magazine is not going away, it’s coming to a screen near you.

Transforming TDI World to an online and constantly updated media content, allows us to truly push forward our rally cry: “Start with Accessibility”. While the paper magazine is enjoyable to have, it also prevents us from making the information we share truly accessible. With the digital transformation, our content will be receivable for the DeafBlind, deaf nonsigners, the signing community, and those whose preferred language isn’t written English.

After the last issue is printed in December 2022, TDI World will be the trifecta in positioning TDI as the example of accessibility and equitability in advanced communications.
When thumbing through the history of TDI and observing its past leadership, board members, and other supporting individuals, one will notice it has largely be white DHH men (and several women) leading the way – and that is not a true representation of the deaf and hard of hearing community.

While still true today, the Board has long recognized this and has proactively taken steps to ensure the Board is diverse and populated by subject matter experts while still representing regional TDI members. Currently, the TDI Board has a good mix, and we are engaging outside consultation to help us identify other areas to improve in our outreach and inclusion efforts.

However, it is not just internally where TDI needs to ensure diversity, but also in its membership, partnerships, and policy proposal efforts. Undeniably, the thousands of policy proposals we’ve filed to federal agencies lacked input from our black, brown, indigenous, and islanders throughout the deaf and hard of hearing community.

Effective immediately, all national BIPOC DHH 501(c)(3) membership organizations shall have a free nonprofit affiliate membership with TDI, and their active members can join TDI as a member with a 50% discount.

We’ve also invited these organizations to become sign-on members of TDI’s filings which means their elected leadership will be provided the opportunity to review drafts of TDI’s policy comments and propose additional language and edits to ensure policies are beneficial to BIPOC members of the DHH community.

In addition to representing BIPOC DHH community members, TDI is actively engaging with organizations that represent deaf and hard of hearing non-signers. This includes those who prefer speechreading, cued language, lipreading, or other communication modalities. For TDI to truly represent the fast-growing 48 million Americans with hearing loss, it needs a way to reach all deaf and hard of hearing people on the spectrum.

To do this, TDI is sharing our filing drafts with the following organizations: CueSign, HEARD, National Asian Deaf Congress, National Asian Pacific Islander Deaf Coalition, National Black Deaf Advocates, National Cued Speech Organization, National Hispanic Latino Association of the Deaf, and Turtle Island Hand Talk. TDI has long maintained, and still fosters a healthy relationship with a number of prominent DHH organizations such as AADB, ALDA, CPADO, DSA, HLAA, and NAD.

TDI understands this is a modest step forward, and there is still much to be done to ensure TDI is truly an inclusive organization which accurately represents a diverse community in our advocacy work for equitable experience in information and communication technologies.
Near the end of 2019, TDI’s Training Institute was conceived initially as a one-day event to occur every two years. Originally scheduled for the spring of 2020, right when COVID-19 health crisis arose and briefly paralyzed the nation’s economy, it did not happen. So, coupled with the leadership change at TDI, the Training Institute went on hiatus.

The temporary pause of the Training Institute allowed us more time to better define the program, and enable it to be more inclusive and accessible to the deaf and hard of hearing community.

Today, the Training Institute is being designed and built as an online repository of timely information pertaining to accessibility for the deaf and hard of hearing. Whether you’re a professional developer in accessibility technology, or a DHH community member wanting to learn about the technology accommodations, the TDI Training Institute portal will have a tutorial video providing the how-to. We will continue to expand and add videos and learning materials every year, growing the collection and being the beacon of light for accessibility.

TDI’s purpose for the Training Institute is simple- to make information accessible to everyone. Training videos will be divided into two categories - those for community members, and for industry professionals.

At any time, viewers will be able to access and use the on-demand training videos and resources. Not all the videos will be created by TDI. We will be welcoming and pursuing submissions from all over the globe. Our only requirement is that all training videos to be offered are to be accessible for all DHH people, meaning videos must be presented with voiceover, in sign language, captioned, along with transcripts including alt-text for image descriptions attached.

Over time, TDI intends to have content that helps anyone access or create access to information and communication technologies as they develop. The TDI Training Institute is where one goes to learn about Real Time Text (RTT), understand the current and future ways to access emergency communications, minimum accessibility features when developing a multimodality media platform, and so much more.

Watch for more details about the TDI Training Institute soon.
The Success of Our Future Begins With Our Youth

The importance of the youth of our Deaf/HH community cannot be understated. Yet the majority of DHH youth are unaware of TDI, cannot name the inventor of the TTY, or identify at least one significant legislation pertaining to access rights of DHH – other than the Americans with Disabilities Act (ADA). This disconnect must be replaced with a strong transitional pipeline that connects, engages and supports our DHH youth. The only way to firmly ensure the D/HH community does not regress back into the dark ages of inaccessibility is to empower our youth.

As TDI continues shaping an accessible world, we recognize that we need our youth more than ever. We must forge a connection that will benefit all. The policies that we advocate are for their futures. As the intermediary between the deaf/ hh community, industry leaders and policy makers, TDI's impact can only expand when we include the insights and perspectives of our younger members.

We are in a world of advanced communication services (ACS), and all the accessible policies we've fought for in the past are becoming detached from the new era of telecommunications.

The world has changed exponentially since the days of having a captioning decoder the size of a VCR. It was only 30-some years ago when we had to manually push a button on a box attached to our tv to get captioning. Today we have automated speech recognition that is driving closed captioning today.

What was once picking up a phone to make a call has now transformed to saying “Hey Siri, call my sister”. In fact, one no longer needs a telephone to make a call. Computers, watches, and smart speakers are alternatives to the telephone.

We are in transition from playing a simple one/two player game on our Nintendo, to having a team of players across the country communicating through the gaming console, in real-time. As well as esports — e-sports that is becoming a trend or soon-to-be nowadays, a type of organized, multiplayer competition engendering video games between the professional individual players or in a professional team.

Technology has changed the world as we know it, affecting all corners of our lives. From transportation to telecommunications to our home devices (Internet-of-Things [IoT]- smart doorbells, thermostats, ovens and refrigerators) to media information.

This is not the future, it is here - now. And it is changing at a speed that most of us cannot keep up with. But you know who can and does? Our youth, who are the ones positioned to make an impact on the future of accessibility for the deaf and hard of hearing community.

We must engage with them to understand how their current accessibility technology came to be. By collaborating with them, they will know how advocacy resources will help them such as in the past, how the advocacy work we did with other organizations paved the way for nationwide usage of phones, computers and even video games in an accessible manner. And then we must empower them to take on the mantle of accessibility and lead the way into the future for us.

To accomplish this connection, TDI is exploring and developing events and receptions spotlighting our DHH youth. We're working with industry contacts to identify ways to showcase accessibility innovations by DHH youth. We're continuing with the goal of expanding our annual scholarship programs for high school graduates along with having a robust internship program in which we had six motivated interns last Spring 2021.
Reply Comments on the Telecommunication Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities
CG Docket Nos. 03-123

Structure and Practices of the Video Relay Service Program
CG Docket Nos. 10-51

Misuse of Internet Protocol (IP) Captioned Telephone Service
CG Docket Nos. 13-24

(April 2) HLAA, TDI, ADARA, ALDA, CCASDHH, CPADO, CueSign, DSA, NAD, NCSA, DHH-RERC, and IT-RERC (“Consumer Groups”) filed a reply comment to the previous filing related to IP CTS metrics.

We noted there is agreement among all IP CTS stakeholders the current rules should be amended to provide accurate measurements of the quality of services.

Additionally, there was consensus that standards should be thoroughly researched before FCC approves any metric and performance standards. We continue to encourage the Commission to adopt standards developed by an independent American National Standard Institute (ANSI)-accredited body with input from all relevant stakeholders to ensure that consumers are receiving equitable communication services to fully participate in society.

Nevertheless, we disagreed with the providers on four things, and urge the Commission to:

Use an ANSI-accredited body to develop metrics before setting any type of interim metrics. All metrics and performance standards must reflect consumer needs.
After metrics are adopted, all testing should be done by an independent company.
A bridge policy to ensure human captioners are not “priced out” of the market by automated speech recognition (ASR) applications.
Adopt a rating system for consumers to elevate quality concerns.


OTHER

Comment on the Establishing Emergency Connectivity Fund to Close the Homework Gap

WC Docket Nos. 21-93

(April 5) TDI, ALDA, CPADO, CSD, CEASD, DSA, HLAA, NASADHH, NAD, NCSA, NVRC, RID, and DHH-RERC filed a comment to the FCC about the establishment of Emergency Connectivity Fund to Close the Homework Gap.

As part of the American Rescue Plan Act of 2021, this fund is to help schools and libraries provide devices and connectivity to students, school staff, and library patrons during the COVID-19 pandemic. We applauded the FCC for this speedy action to ensure that Deaf, Hard of Hearing, and DeafBlind communities have access.

We supported the FCC adopting rules to make sure “connected devices” are accessible and usable to these communities during the pandemic, especially the demand on the virtual video conferences. However, video conferences are not that often accessible such as having captioning services or having relay services.

We encouraged the FCC to consider additional equipment or services that would be helpful for these communities. Off the shelf, multimodal equipment that is able to support audio/video communications and access relay services should be considered for reimbursement.

We disagreed with the FCC’s current 25/3 broadband speed benchmark. Households with a student who is deaf, hard of hearing, DeafBlind, or deaf with mobility issues requires at least 50/50 broadband speed to accommodate quality video services using all types of relay services.

We reminded the Commission to not impose data caps or throttling on internet service offerings for students who are deaf, hard of hearing, DeafBlind, or deaf with mobility issues. We also shared that many video conferencing platforms do not offer adequate captioning capabilities and are not accessible to relay services. Therefore, students who are deaf, hard of hearing, DeafBlind, or deaf with mobility issues may need human captioners, ASL interpreters, CLTs, and other services to ensure e-learning classrooms are accessible.

We agreed that the FCC should allow schools and libraries to place Wi-Fi hotspots at various locations outside of schools and libraries. Additional locations and offerings should be considered such as recreation centers, and mobile wi-fi hotspots on buses.


EMERGENCY COMMUNICATIONS

Letter on the Matter of Wireless E911 Location Accuracy Requirements: Letter in Opposition of Petitions for Waiver

PS Docket Nos. 07-114

(April 6) TDI, CPADO, HLAA, NAD, NCSA, NVRC, RID, and DHH-RERC filed a letter to the Federal Communications Commission to opposing the petitions for waiver made by telecommunications companies.

We urged the Commission to deny the petitions for waiver made by AT&T, T-Mobile, and Verizon to extend the deadline on April 3, 2021 for the provision of vertical location information to support emergency response for wireless callers to E911 emergency services. If the waiver is granted, then the delay in the provision will affect critical efforts in location information that could save lives.

Accurate vertical location information is critical in ensuring that emergency services have the capacity to reach individuals who are deaf, hard of hearing, DeafBlind, or deaf with mobility issues who may not be able to communicate their precise location on a voice call with an E911 operator.

Many people with disabilities often live in high-density buildings with multiple floors, and timing is crucial in finding their location. With the z-axis (vertical) location information sent to emergency responders, lives will be
saved and thus we request the FCC to uphold its deadline.


OTHER

Comment on the Federal-State Joint Board on Universal Service Lifeline and Link-Up Lifeline and Link Up Reform and Modernization

WC Docket Nos. 11-42

(April 19) TDI, AADB, ADARA, ALDA, CCASDHH, CPADO, CSD, CEASD, CueSign, DSA, HLAA, NAD, NBDA, NCSA, NVRC, RID, DHH-RERC, and IT-RERC filed a comment to the Federal Communications Commission in response to the FCC’s request for public comments concerning the state of the Lifeline program.

We all advocated for equal access to communications including the provision of affordable services and equipment, for the more than 48 million Americans who are hard of hearing, Deaf, or DeafBlind.

While the Lifeline program has significantly helped eligible participants, we urge the Commission to reduce barriers for eligible people to qualify while increasing the required speed and data standards to allow Lifeline to fulfill its purpose: to help “ensure that low-income consumers can afford 21st-century broadband and the access it provides to jobs, healthcare, and educational resources.”

However, many eligible Deaf and hard-of-hearing participants experienced barriers when trying to access the Lifeline program. Access to services provided by these broadband carriers varies considerably based on geography and infrastructure. We shared a story of an eligible Deafblind man who struggled to access broadband accessibility and has no connection at home.

In fact, according to the latest publicly available data for 2021, only about 26% of eligible people take part in the Lifeline program.9 In part, this is a result of barriers to participation, including:

- Maintaining periodic eligibility verification
- Having sufficient income to afford the cost of broadband after the discount.
- Voice and broadband service costs continue to increase, making the Lifeline program necessary for millions of eligible Americans.

Costs for broadband services continue to rise every year like clockwork. As prices continue to rise, affordability slips through the grasp of millions of Americans. This situation means that government programs such as Lifeline become even more essential for Americans to maintain connectivity.

The Lifeline program provides exactly that to its participants: a lifeline to essential communications services. However, the Lifeline program’s minimum requirements are insufficient for video calling and other essential communications services.

The Commission should increase minimum speeds under the Lifeline program to reflect what is needed by consumers, including those who are deaf or hard of hearing. The Commission should adopt a minimum speed requirement of 50/50 Mbps download/upload speed requirement for home broadband use. Also, the current minimum data cap of 1024 GB per month is also insufficient for some users.

We urged the Commission to spur increases in speed minimums for mobile access, as the current 3G minimum simply is not sufficient for many applications. The current minimum mandate of 4.5 GB per month on a mobile network22 is far too low to be useful to a person who is deaf or hard of hearing using his or her phone or mobile device to use modern applications necessary for people to work, take part in school, or connect with friends, family, or essential services.

The FCC should also consider the needs of the different groups of people who are deaf or hard of hearing who have voice-only and data-focused plans.

For that reason, we recommend the Commission examine such bundling programs to mandate minimums—high speeds, unlimited data, and voice services that are in line with what is commonly offered in the market. Then, the Commission should mandate telecommunications providers provide similar services under the Lifeline program. That is, eligible participants should be able to secure a plan...
comparable to commonly offered family bundled plans but at the reduced price as mandated by Lifeline.


**EMERGENCY COMMUNICATIONS**

**Comment on the Wireless Emergency Alerts and Emergency Alert System**

**PS Docket Nos. 15-91 and PS Docket Nos. 15-94**

(April 20) TDI, AADB, ALDA, CCASDHH, CPADO, CEASD, DSA, HLAA, NASADHH, NAD, NCSA, NVRC, RID, DHH-RERC, and IT-RERC filed a comment to the Federal Communications Commission about its notice of proposed rulemaking on its implementation of Section 9201 of the William M. (Mac) Thornberry National Defense Authorization Act for the fiscal year 2021.

We supported the Commission’s actions in this proceeding and provided these comments to recommend steps the Commission can take to ensure that the WEA and EAS are accessible to all Americans, including consumers with disabilities.

We also supported the Commission’s proposal to rename WEAs “Presidential Alert” class of alert messages to “National Alert” and to include alerts from the Administrator of the Federal Emergency Management Agency (“FEMA”) within the National Alert category. We recognized FEMA’s efforts to reach out to Deaf and hard-of-hearing communities with additional interpreting support. However, many people from these communities were left out from the emergency alerting process or experienced communication issues.

In fact, according to preliminary research performed by TDI, approximately 45% of deaf and hard-of-hearing individuals are unaware of WEAs. Moreover, 69% are unsure of whether they have WEA capability on their smartphones. Thus, we believed that designating National Alerts as a non-optional category of alerts would be the best way to include these communities to be aware of what is happening in their areas.

Therefore, we urged the Commission to require that all National Alerts (including Presidential and FEMA alerts) include a link to a website where individuals can access more information about the subject alert. Such information should be made available (at a minimum) in ASL and other languages.

In addition, we believe that State Emergency Communications Committees (SECC) should consult with representatives from the Deaf and Hard of Hearing Communities. The Commission should have each chief executive from each state set up these committees to review the composition and governance of the SECC.

Also, the State EAS Plans should ensure communication accessibility for consumers with disabilities. In one specific section, it mentions they should ensure timely communication access used by non-speaking English populations, however, we were not sure if deaf and hard of hearing communities are included in that category. Therefore, we required the EAS alert content to be provided in ASL as well as written in plain language easy to understand. Simple messages are needed to elicit appropriate responses from individuals affected by the disaster including people with limited English comprehension.

We saw that according to TDI’s research, approximately 4% of the deaf and hard of hearing population do not have wireless devices and therefore lack access to WEAs. We requested making Emergency Alerts accessible for consumers with disabilities. The Commission should also ensure that emergency alerts can reach and be displayed on electronic traffic billboards as well as electronic signage at train and airport terminals.


**ADVANCED COMMUNICATION SERVICES**

**Comment on the Consumer and Governmental Affairs, Media, and Wireless Telecommunications Bureaus Seek Update on Commission's Fulfillment of the Twenty-First Century Communications and Video Accessibility Act**

**GN Docket Nos. 21-40**

(June 7) TDI, AADB, ADARA, ALDA, CCASDHH, CPADO, CSD, CEASD, CueSign, DSA, Wireless RERC, HEARD, HLAA, NAD, NBDA, NCSA, NHLAD, NVRC, RID, Rehabilitation Engineering Research Center for
Wireless Inclusive Technologies, DHH-RERC, IT-RERC, and CAT filed a comment to the FCC about its fulfillment of the Twenty-First Century Communications and Video Accessibility Act.

We respectfully submitted the comment after the Commission passed the public notice on the revisiting of the Twenty-First Century Communications and Video Accessibility Act. Many of our organizations played a significant role in having the FCC’s implementation of the Twenty-First Century Communications and Video Accessibility Act of 2010 (CVAA), including taking part in the foundational Video Programming Accessibility Advisory Committee (VPAAC) and subsequent iterations of the Commission’s Disability Advisory Committee (DAC), as well as the drafting and implementation of the numerous accessibility-focused measures taken by the Commission dating back to the late 1970s.

We applauded the Commission’s acknowledgment in the Accessibility Revitalization PN that many of its implementing regulations “have been in effect now for many years, and many of them have not been revisited recently.” We identified several priorities that the Commission should revisit in the areas of communications, video programming, and access for all deaf and hard of hearing communities including people with disabilities or people who live in distant rural or tribal lands.

The Commission should overhaul its advanced communications service and relay rules for modern IP-based multimodal communications platforms

Inaccessible issues with modern IP-based platforms such as Zoom, Google Meet, Discord, Slack, Apple FaceTime, Google Duo, Facebook Messenger, and much more

The Commission must address the issues with video functionality and performance in IP-based multimodal communications platforms

The Commission should revisit Section 225’s functional equivalence mandate to facilitate the development of interoperable next-generation relay services

The Commission should improve access to multimodal and 9-1-1 services by accelerating the availability of real-time text (RTT) services and updating its emergency access rules

The Commission should ensure that broadband services can accommodate bandwidth-intensive multimodal services without unjust or discriminatory fees or data caps

The Commission should overhaul its closed captioning rules for a modern online video distributors (OVD) centric ecosystem

The commission should revisit the rules on the television ecosystem

OVD market includes a wide array of generalized streaming services including Netflix, Hulu, and Amazon Prime, studio-specific services such as Disney Plus, HBO Max, Showtime, Paramount Plus, Peacock, Epix Now, Starz, Discovery+, and Apple TV+

The Commission should adjust its television closed captioning rules to include OVDs

The Commission should revisit and revise or eliminate the categorical exemptions from the television rules

The Commission should adopt captioning quality metrics for live programming and clarify how the existing quality standards apply to ASR, not only ASR but also to interfaces for captioning systems

The Commission should take a similar approach to expand and overhaul its audio description rules.

The Commission should continue to press ahead on communications access for people with hearing loss

The Commission should ensure that connectivity to wireless phones for people using hearing devices remains reliable, affordable, and accessible

The Commission should implement the DAC’s recommendation on standards for amplification measurement procedures and performance criteria for high-gain amplified telephone handset acoustics in telephone devices

The Commission should launch an inquiry into wideband and ultra wideband audio

The Commission should launch dedicated inquiries into the accessibility of communications, video programming, and hearing devices for people who have multiple disabilities, for older Americans, and those who live on rural and tribal lands and U.S. territories

The Commission should take a holistic approach to this proceeding and emphasize supervised multistakeholderism,
centering the civil rights of people with disabilities, vigorous enforcement, and reporting to Congress

The Commission should continue to center the civil rights of people with disabilities

The Commission should conduct a comprehensive review of its authority and rules under all relevant provisions of the Communications Act of 1934 and report shortcomings to Congress

We will still continue to support the Commission to ensure equitable access to the full range of digital communications and video technologies that dominate twenty-first-century American life is reached.


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