



Wireless Communications Association International

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October 1, 2007

Marlene H. Dortch
Secretary
Federal Communications Commission
445 Twelfth Street, SW
Washington, DC 20554

Re: *IP-Enabled Services; Implementation of Sections 255 and 251(a)(2) of The Communications Act of 1934, as Enacted by The Telecommunications Act of 1996: Access to Telecommunications Service, Telecommunications Equipment and Customer Premises Equipment by Persons with Disabilities; Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities; The Use of N11 Codes and Other Abbreviated Dialing Arrangements.* – WT Docket No. 04-36 *et al.*

Dear Ms. Dortch:

The Wireless Communications Association International, Inc. (“WCA”) is writing in response to the September 14, 2007 Motion for Stay or Waiver filed by the Voice on the Net (VON) Coalition (“VON Motion”); the September 21, 2007 Petition for Waiver of Certain Regulations Concerning Provision of 711 Dialing filed by the United States Telecom Association (“US Telecom Petition”); the September 21, 2007 Petition for Waiver filed by Hamilton Telephone Company d/b/a Hamilton Telecommunications; and the September 27, 2007 Opposition to the VON Petition and the USTelecom Petition filed by the Coalition of Organizations for Accessible Technology (“COAT Opposition”) in the above-referenced proceeding.¹ Consistent with COAT’s suggestion that “a brief extension of time for each of these requests may be merited,”² WCA respectfully requests that the Commission afford providers of wireless interconnected voice over Internet protocol (“VoIP”) service a limited extension of the October 5, 2007 deadline for compliance with the Telecommunications Relay Service (“TRS”) requirements set forth in Part 64, Subpart F of the Commission’s Rules (excluding 47 C.F.R. § 64.604(5)(iii)) and mandated by the Commission’s *Report and Order* released June 15, 2007.³ WCA submits that an extension of one year (*i.e.*, from October 5, 2007

¹ See Voice on the Net (VON) Coalition Motion for Stay or Waiver, WC Docket No. 04-36 *et al.* (filed Sept. 14, 2007) [“VON Motion”]; United States Telecom Association Petition for Waiver of Certain Regulations Concerning Provision of 711 Dialing, WC Docket No. 04-36 *et al.* (filed Sept. 21, 2007) [“USTelecom Petition”]; Hamilton Telephone Company d/b/a/ Hamilton Telecommunications Petition for Waiver, WC Docket No. 04-36 *et al.* (filed Sept. 21, 2007); Opposition by the Coalition of Organizations for Accessible Technology (COAT), WC Docket No. 04-36 *et al.* (filed Sept. 27, 2007) [“COAT Opposition”].

² COAT Opposition at 6.

³ *IP-Enabled Services et al.*, Report and Order, 22 FCC Rcd 11275 (2007) [“*Report and Order*”].

to October 5, 2008) will serve the public interest by giving providers of wireless interconnected VoIP service much needed additional time to address significant technical issues that have arisen during the wireless broadband industry's implementation of the TRS capabilities required by the *Report and Order*.⁴

Providers of interconnected VoIP service are very cognizant of their public service obligations and are making significant efforts to ensure that interconnected VoIP offers the same level and quality of service that consumers have come to expect from conventional landline or mobile wireless offerings. Nonetheless, in their efforts to comply with the Commission's TRS requirements since the June 15 release of the *Report and Order*, interconnected VoIP providers have encountered substantial technical obstacles that, if left unresolved, will prevent them from delivering TRS-based services that are of any value to hearing-impaired or speech-impaired consumers. Unfortunately, these issues are complex and cannot be resolved in less than four months (*i.e.*, the period between June 15 and the October 5, 2007 compliance deadline). Among other things, a meaningful solution requires cooperation and dialogue among a variety of interested parties, including service providers, vendors, the disabled community, TRS providers, and, where "dial 711" issues are concerned, the public safety community.⁵ The Commission's objectives in this proceeding are not well-served by stopping that process in its tracks and enforcing an arbitrary compliance deadline that bears no relation to what is actually achievable with current IP-based technology.

Ultimately, the core problem here is that providers of interconnected VoIP service are struggling with how to prevent degradation of TRS services where legacy analog TTY devices are supported by packet-based broadband networks designed and optimized for data, irrespective of the type of technology used (*i.e.*, DSL, wireless, or cable). In an IP-based environment, the quality of an analog TTY signal is difficult to sustain due to the latency and packet loss inherent to packet-based broadband networks. Indeed, while an ordinary VoIP conversation might survive some packet loss and latency, this is not true of VoIP conversations conducted via TTY devices – even small levels of latency and packet loss can create incoherent lettering at the "far end" TTY device and, therefore, garbled conversations. This is especially so in the wireless context, where ordinary packet loss and latency may be exacerbated by signal propagation difficulties and other challenges unique to wireless technology. Compounding the problem, VoIP and other real-time applications that use Real-time Transmission Protocol ("RTP") do not have a mechanism to recover lost packets or insert exceptionally late packets.

While in the future it may be technically possible to eliminate these obstacles, many wireline and wireless VoIP providers have discovered in the wake of the *Report and Order* that doing so is far more difficult than originally anticipated. Even in the best case, TTY calls over

⁴ As the trade association of the wireless broadband industry, WCA has a direct and immediate interest in the Commission's proposal to apply its TRS requirements to providers of interconnected VoIP service. WCA's membership includes a wide array of companies that are well along in designing network architectures, acquiring equipment and launching new wireless broadband networks that allow them to offer interconnected VoIP service to consumers equipped with fixed, portable and mobile devices. In addition, WCA's membership includes most of the major equipment vendors that are providing the technology behind those new networks. Accordingly, this proceeding has significant implications for WCA's constituents.

⁵ *See, e.g.*, USTelecom Petition at 2.

existing broadband networks are often of poor quality and thus virtually incomprehensible, and the Commission's October 5, 2007 compliance deadline cannot make it otherwise. Under these circumstances, enforcement of the deadline will force operators to invest substantial resources in deploying inadequate TRS solutions that, while in compliance with the letter of the Commission's TRS requirements, will not advance the Commission's overriding goal of making interconnected VoIP service more accessible to hearing-impaired or speech-impaired consumers.⁶

WCA therefore submits that the better solution is to afford wireless broadband operators an extension of the October 5, 2007 compliance deadline to October 5, 2008, so that they are provided an adequate opportunity to coordinate with other interested parties, test equipment and continue all other steps necessary for developing TRS solutions that provide hearing-impaired and speech-impaired consumers with *bona fide* access to wireless interconnected VoIP service. While WCA believes that one year may be less time than what is truly required here, it is limiting its request in deference to COAT's desire to avoid extensions of the October 5, 2007 deadline that continue indefinitely.⁷

Should there be any questions concerning this submission, please contact the undersigned.

Respectfully submitted,

/s/ Andrew Kreig

Andrew Kreig
President

cc: Stacy L. Pies
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Jennifer Simpson
Eric Fishman

⁶ See VON Motion at 3 (noting that TRS users "may benefit by the Commission allowing sufficient time for implementation and testing to ensure effective delivery of TRS services rather than suffering from hastily deployed services intended to meet an unreasonable and arbitrary deadline").

⁷ See COAT Opposition at 6-7.