

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of)	
)	
Petition for Waiver of Rules Requiring)	GN Docket No. 15-178
Support of TTY Technology)	

IP-Voice Accessibility Status Report of AT&T

Pursuant to Federal Communications Commission (“Commission”) Order released October 6, 2015,¹ AT&T submits this semi-annual report of its progress toward the development of IP-based accessibility solutions for voice communications and the status of the availability of those solutions. AT&T is notifying customers in bill messages, on its website, and by other effective means about how to access this report.

1. Progress and Status of Accessibility Efforts. AT&T continues its efforts to develop RFC 4103-based real-time-text (“RTT”) to deliver access to IP-based networks to persons with disabilities. AT&T continues to target end-of-year (“EOY”) 2017 for an application (“apps”) based over-the-top (“OTT”) RTT solution and EOY 2018 for a mobile device embedded RTT solution. These target dates are dependent on pending industry standards setting by the Alliance for Telecommunications Industry Solutions (“ATIS”) and mobile device manufacturer development cycles.

Since the October 2016 Status Report, AT&T has received from its vendors and tested multiple iterations of the OTT RTT apps for Android and iOS devices, software upgrades needed to support these OTT RTT apps, and the virtual RTT-TTY interworking gateway, which will

¹ Petition for Waiver of Rules Requiring Support of TTY Technology, *Order*, GN Docket No. 15-178, 30 FCC Rcd 10855 (2015).

enable backward compatibility between RTT and TTY. The delivery of a Windows version of the RTT OTT app was purposefully delayed to benefit from testing of the other apps and is now expected for delivery to AT&T by end of 2nd Quarter 2017. The test plan for current and modified RTT OTT apps releases will extend further into 2017 until all functions “pass,” but, at this point, is not expected to alter the EOY 2017 target to provide an RTT OTT application across Android, iOS, and Windows operating systems. This test plan includes an analysis of backward compatibility functions, RTT-to-RTT calls, authentication, IP Multimedia subsystem (IMS) registration, integrated dialer capabilities, administrative processing and rating of RTT sessions, and other network configurations. AT&T expects to begin user testing of the OTT RTT solutions no later than May 2017, including testing of the user interface and use with Braille screen readers.

On January 30, 2017, ATIS finalized the RTT Mobile Device Behavior [MDB] Specification standard (ATIS-0700029). ATIS continues work on standard RTT E2E (end-to-end) Service Description, which should be finalized in mid-2017. As standards are adopted, AT&T is providing mobile device manufacturers with its requirements for the development of an embedded RTT solution. AT&T will thoroughly test all embedded solutions delivered.

2. Interoperability. AT&T is working with a Tier-1 wireless carrier on the development of RTT to RTT interoperability across networks and has initiated contact to begin that dialogue with the other Tier-1 carriers. Wireless carriers are in various stages of technology development. The RTT E2E Service Description standard is expected to address interoperability issues, among others, which should minimize the questions and challenges faced by wireless providers seeking to develop interoperable RTT. AT&T will provide more clarity on interoperability issues in future RTT reports.

3. Backward Compatibility. AT&T's virtual RTT-TTY interworking gateway, which will deliver the backward compatibility function, is being tested in AT&T Labs and is expected to deploy in production around late 2nd Quarter/early 3rd Quarter 2017. This gateway allows RTT users to communicate with TTY users, including E911 emergency services, 711 relay services, and accessible businesses.

4. 911 Call Delivery. E911 call delivery utilizing the RTT OTT apps is in lab testing. AT&T is currently working with West f/k/a Intrado on connectivity issues and expects to soon begin working with West and select PSAPs to test RTT call delivery and retention over the OTT app. Generally, OTT RTT will deliver the 911 call over the best available and accessible network (e.g. Wi-Fi, LTE).

5. Estimated Timeline: AT&T has not encountered any insurmountable obstacles to the development of the OTT RTT apps. AT&T still expects to launch OTT RTT apps no later than EOY 2017 and an embedded RTT solution by EOY 2018. These timelines could be impacted by unexpected delays with ATIS standards setting, manufacturer development cycles, and unexpected impacts from operating system changes.

Dated: April 6, 2017

Respectfully submitted,



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