

APPROVED AND ADOPTED BY THE  
DISABILITY ADVISORY COMMITTEE  
February 23, 2016

Recommendation of the FCC Disability Advisory Committee  
Relay/EDP Subcommittee  
February 23, 2016

WHEREAS, direct access to 9-1-1 was available to the Deaf and hard of hearing community following the enactment of the Americans with Disabilities Act and the placement of TTY devices in 9-1-1 call centers nationwide; and

WHEREAS, direct access to 9-1-1 from wireline TTYs for the Deaf and hard of hearing is gradually declining with the advent of more technologically advanced options that provide direct access to 9-1-1 for Deaf and Hard of Hearing, such as Text-to-9-1-1; and

WHEREAS, Next Generation 9-1-1 (“NG9-1-1”) is intended to improve public emergency communications services for an increasingly wireless mobile society by enabling users to transmit text, images, video and data to Public Safety Answering Points (“PSAPs”) along with many other features; and

WHEREAS, in 2011, the National Emergency Number Association (“NENA”) issued a document titled “Detailed Functional and Interface Specification for the NENA i3 Solution”, describing the network components and interfaces required for NG9-1-1 service, commonly known as the “i3 Solution; and

WHEREAS, the NENA i3 Solution supports end-to-end Internet Protocol (“IP”) connectivity; includes gateways to accommodate legacy wireline and wireless origination networks that are non-IP and introduces the concept of an Emergency Services IP network (“ESInet”); and

WHEREAS, a series of NENA’s Industry Collaboration Events (“ICE”) were held and comprehensive end-to-end functionality, interaction between vendor elements (external interfaces), and interoperability were tested; and

WHEREAS, on June 10, 2013, the Federal Communications Commission (“FCC”) released a Report and Order and Further Notice of Proposed Rulemaking (“VRS Reform Order”) adopting several measures to improve the structure, efficiency and quality of the video relay service program; and

WHEREAS, by the VRS Reform Order, the Commission directed its Managing Director to select a neutral party to develop and implement a Video Access Technology Reference Platform (“VATRP”), to be developed using open protocols to the extent practicable; and

WHEREAS, the Reform Order takes a number of actions to restructure the VRS program, including steps that will ensure the interoperability and portability of video equipment as well as off-the-shelf video technology; and

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WHEREAS, on May 21, 2015, the FCC awarded a contract to VTCSecure, LLC to develop and implement the VATRP, now referred to as the Accessible Communications for Everyone Access Point Platform (“ACE APP”); and

WHEREAS, the ACE APP will be a set of open source, standards-based applications usable on today's most common mobile and desktop operating systems that will allow for real-time text, voice and high quality video communications and be interoperable with the existing Telecommunications Relay Service provider networks that use the Session Initiation Protocols<sup>1</sup>; and

WHEREAS, ACE APP, if compatible with the NENA i3 Solution, can provide a direct video communications access option to 9-1-1, supplementing text-to-9-1-1, the first direct access option to 9-1-1 for the Deaf and hard of hearing since the enactment of the ADA in 1990; and

WHEREAS, in 1991, the Department of Justice (“DOJ”) published a regulation to implement Title II of the Americans with Disabilities Act of 1990 (ADA), which included the requirement that PSAPs provide direct access to persons with disabilities who use telecommunication devices for the deaf; and

WHEREAS, on July 26, 2010, the DOJ published an Advance Notice of Proposed Rulemaking (“ANPRM”) and sought information on possible revisions to the Department’s regulation to ensure direct access to NG 9-1-1 services for individuals with disabilities; and

WHEREAS, the ADA was amended by the final rule published on September 15, 2010 and the definition of auxiliary aids and services has expanded to include equally effective telecommunications systems to communicate with individuals with disabilities<sup>2</sup>; and

NOW, THEREFORE, IT IS --

RECOMMENDED, that the FCC take steps to prove that the ACE APP can provide direct video access to 9-1-1 in a reliable and compatible manner; and

RECOMMENDED further, that the FCC work with NENA to test ACE compatibility with the i3 Solution at the earliest available opportunity during a NG9-1-1 Industry Collaboration Event; and

RECOMMENDED further, that the FCC work with the VTCSecure to ensure ACE APP compatibility with the NENA i3 Solution; and

RECOMMENDED further, that the FCC ensures the results of such work with VTCSecure and the ACE APP are made available publicly, and remain as open interfaces available to the industry.

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<sup>1</sup> <http://www.vtcsecure.com/products/vatrp-video-access-technology-reference-platform/>

<sup>2</sup> <http://apps.fcc.gov/ecfs/document/view?id=7022129201>