

Before the
Federal Communications Commission
Washington, DC 20554

In the Matter of: AT&T / T-Mobile Merger))))))))	WT Docket No. 11-65
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**Ex-Parte Comments of
Telecommunications for the Deaf and Hard of Hearing, Inc. (TDI)**
in response to the Commission's
**Review of Proposed Merger between
AT&T / T-Mobile**

Filed: November 18, 2011	Claude L. Stout Executive Director Telecommunications for the Deaf and Hard of Hearing, Inc. 8630 Fenton Street, Suite 604 Silver Spring, MD 20910
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Comments

Telecommunications for the Deaf and Hard of Hearing, Inc. (TDI), submit these comments in response to the Federal Communication Commission's Review of the Proposed Merger between AT&T and T-Mobile, Wireless Telecommunications Bureau (WT) Docket No. 11-65.

TDI seeks to promote equal access to telecommunications, including wireless communications, for the 36 million Americans who are deaf, hard of hearing, late-deafened, or deaf-blind (collectively, those who are “deaf or hard of hearing”) so that they may fully experience the informational, educational, cultural, and societal opportunities afforded by the telecommunications revolution. In particular, we seek to offer the perspective of the deaf and hard-of-hearing consumer communities to the Commission as it reviews the proposed merger between AT&T and T-Mobile ensuring access to the broad array of products and services used by current and prospective consumers to experience wireless communications.

While TDI generally refrains from endorsing any products or services offered by any company, including AT&T and T-Mobile, TDI has noted from working with these individual companies their strong commitment to disability access. Based on the same four factors that TDI has expressed during previous mergers, TDI is confident that the combined entity will continue to uphold the principles of accessibility and will not divert from its long standing commitments in providing full inclusion of people with disabilities in the spirit of Section 255 of the Telecommunications Act and the recently enacted Communications and Video Accessibility Act of 2010 (CVAA).

Universal availability of Broadband Internet in the U.S. is one of the greatest infrastructure challenges America faces today. The Federal Communications Commission (FCC) made it clear in its 2010 report, [*Connecting America: The National Broadband Plan*](#), that Broadband is particularly important for Americans with

disabilities because it enables access to affordable assistive technologies in hardware, software, services and digital content. The FCC concluded that the federal government should help promote broadband infrastructure in a manner that ensures people with disabilities have unfettered access to communications services, and that they do not bear disproportionate costs to obtain that access. As a member of the consumer advisory committee to the FCC, I applaud their conclusion and support any and all actions that will make broadband infrastructure and the attendant technologies more accessible to more people, especially those with disabilities.

When I graduated with my second degree in 1980, many of these technologies had not been developed. For nearly 15 years, I have been privileged to serve as Executive Director of [Telecommunications for the Deaf and Hard of Hearing, Inc., \(TDI\)](#). TDI, a national consumer advocacy organization, strives to better meet the access needs of people who are deaf, hard-of-hearing, late-deafened, or deaf-blind in the areas of telecommunications, media and information technology. I know from personal experience that broadband technologies are especially valuable because they enable our constituents to communicate with each other in point-to-point phone calls using voice, text and even video. They also enable communication of these constituents with hearing-consumers through Internet-based services, like Video Relay Services (“VRS”), Internet Protocol Relay (“IP Relay”), Real Time Text (“RTT”) and Internet-Protocol captioned telephone services (“IP CTS”).

TDI has worked with both AT&T and T-Mobile in the past. Both companies stand well on their own as corporate role models supporting people with disabilities. In evaluating mergers, TDI has gone on record in advising the FCC and US Department of Justice that consumers benefit when there is evidence of four factors such as:

1. Consistent collaboration with all stakeholders in every phase of product and service design.
2. A variety of service plans that meet our specific needs with minimal useless features such as data-only plans, accessible customer service support, and alternative formatted promotional materials in broadcast, print and online.
3. Community support through exhibits and workshops at major and local events.
4. Economic benefits through employment of people with disabilities throughout all levels and sustainable business relationships with qualified vendors and service providers with disabilities.

AT&T has indicated that its proposed merger with T-Mobile would permit it to accelerate the deployment of the latest mobile 4G Broadband technology to 55 million Americans that otherwise would not, and in many instances could not, readily be served by either AT&T or T-Mobile on a stand-alone basis. If this fact bears out in the final analysis, a great percentage of this under-served population includes our constituents living in rural areas across the country who are deaf and hard of hearing. As a result, approval of the merger would inarguably further the national goal of promoting broadband infrastructure deployment, and expand the availability of highly-valued mobile broadband access to all Americans, which would be a boon for deaf

and hard of hearing consumers. This is an end result that fills me with hope for what people with hearing disabilities could do with increased access to high-speed wireless broadband.

AT&T has been recognized by TDI and many other groups as a corporate role model in its support of persons with disabilities. G3ict, a UN-sanctioned initiative that includes industry, the public sector, academia and organizations representing persons with disabilities, recently conducted a case study on AT&T's success in identifying and incorporating accessibility issues confronting people with disabilities. G3ict found that AT&T actively involves persons with disabilities in their internal processes, and as a result has integrated accessibility in product development, human resources, talent retention, recruitment, marketing and customer service.

For all these reasons, TDI supports any prospective corporate mergers, including the AT&T / T-Mobile union, based on the four factors, and believes that the merged entity would not deviate from its long-standing commitment to consumers with disabilities.

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