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August 14, 2018

Via Email

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: *Ex Parte* – ACTA Update on HAC Compliant Advanced Communications Services (ACS) Telephonic Customer Premise Equipment (CPE)
CG Docket No. 13-46, WT Docket Nos. 07-250 and 10-254

Dear Ms. Dortch:

On August 10, 2018 representatives from the Administrative Council for Terminal Attachments (ACTA) met via virtual meeting with representatives of the Federal Communications Commission to discuss the ACTA's efforts to accommodate the registration of Hearing Aid Compatible (HAC)-Compliant Advanced Communications Services (ACS) telephonic Customer Premise Equipment (CPE) in the ACTA database.

During the meeting, the ACTA previewed with the Commission the information that will be provided in the report requested of the ACTA in the October 26, 2017, *Report and Order* in the above-referenced proceedings. The report will address: (1) the progress of any modifications necessary to accommodate HAC-compliant ACS telephonic CPE in the ACTA database; (2) the pertinent information that ACTA will request from responsible parties for ACS telephonic CPE; and (3) any procedures for submitting or accessing information on HAC-compliant ACS telephonic CPE that will differ from the existing procedures for currently registered terminal equipment.

As noted in the attached presentation, the ACTA has made significant progress in modifying its procedures to accommodate the *Report and Order* and the ACTA database will be ready to receive and make available the information required for registration of HAC-compliant ACS telephonic CPE well before the two-year compliance deadline. The ACTA also explained that it will request the same information and use the same processes for the registration of HAC-compliant ACS telephonic CPE as it does for other equipment that is registered in the ACTA database.

In attendance from the Bureau were Robert Aldrich, Legal Advisor; Consumer and Governmental Affairs Bureau; Susan Bahr, Attorney Advisor, Disability Rights Office, Consumer and Governmental Affairs Bureau; Jim Szeliga, Customer Service Chief, Office of Engineering and Technology; John Vu, Electronics Engineer, Industry Analysis and Technology Division, Wireline Competition Bureau; and Cathy Zima, Deputy Division Chief, Industry Analysis and Technology Division, Wireline Competition Bureau.

In attendance representing the ACTA were: Scott Lambert, ACTA Chair; Mark Cassarino, ACTA Database Manager; Sarah Gresser, ATIS Coordinator; and Thomas Goode, ATIS General Counsel.

A copy of this letter is being filed in the above-referenced docket.

If there are any questions, please contact the undersigned.

Sincerely,

A handwritten signature in black ink, appearing to read "Thomas Goode". The signature is fluid and cursive, written in a professional style.

Thomas Goode
ATIS General Counsel, on behalf of the Administrative Council for Terminal Attachments

cc: Robert Aldrich, Legal Advisor; Consumer and Governmental Affairs Bureau
Susan Bahr, Attorney Advisor, Disability Rights Office, Consumer and Governmental Affairs Bureau
Jim Szeliga, Customer Service Chief, Office of Engineering and Technology
John Vu, Electronics Engineer, Industry Analysis and Technology Division, Wireline Competition Bureau
Cathy Zima, Deputy Division Chief, Industry Analysis and Technology Division, Wireline Competition Bureau



ACTA Update on Support for HAC-Compliant ACS Telephonic CPE

Scott Lambert

ACTA Chair

Mark Cassarino

ACTA Database Manager

Tom Goode

ATIS General Counsel

Steve Barclay

ATIS Sr. Director, Global Standards Dev.



Introduction and Purpose

- Provide an update on the ACTA work to accommodate the registration of Hearing Aid Compliant (HAC) Advanced Communications Services (ACS) telephonic Customer Premise Equipment (CPE) in the ACTA database and preview the information that will be provided in the report requested in the October 26, 2017, *Report and Order*.
 - The ACTA has made significant progress in modifying its procedures to accommodate the *Report and Order*.
 - The ACTA database will be ready to receive and make available the information required for registration of HAC-compliant ACS telephonic CPE well before the two-year compliance deadline.
- The ACTA report will be filed by August 27, 2018.



About ACTA

- Created at the behest of the Commission and jointly sponsored by the Alliance for Telecommunications Industry Solutions (“ATIS”) and the Telecommunications Industry Association (“TIA”), **the Administrative Council for Terminal Attachments**, is an open organization established to:
 - (1) adopt technical criteria and to act as the clearing-house, publishing technical criteria for terminal equipment developed by ANSI-accredited standards development organizations; and
 - (2) establish and maintain a registration database of equipment approved as compliant with the technical criteria. The Administrative Council will not make substantive decisions regarding the development of technical criteria.
- Participation in the ACTA is open to service providers, manufacturers, test labs and other stakeholders. There is no charge to participate in ACTA meetings.



Report and Order

- In the *Report and Order*, the Commission applied the same testing, attestations of compliance, registration, labeling, and complaint handling requirements that currently apply to CPE that is directly connected to the public switched telephone network to ACS telephonic CPE, for purposes of HAC compliance.
- “Responsible parties” for ACS telephonic CPE are therefore to:
 - 1) Have the equipment tested for HAC compliance, with certification of such compliance by a Telecommunication Certification Body (TCB) or by a Supplier’s Declarations of Conformity;
 - 2) Register such equipment in the ACTA terminal equipment database; and
 - 3) Provide appropriate labels and other information to consumers regarding HAC compliance.



Report and Order (cont'd)

- The Commission requested that the ACTA submit a report within 180 days of publication of the *Report and Order* in the *Federal Register* (August 27, 2018) explaining:
 - a) The progress of any modifications necessary to accommodate HAC-compliant ACS telephonic CPE in the database, including any changes to how ACTA will administer the database;
 - b) The pertinent information that ACTA will request from responsible parties for ACS telephonic CPE, especially for the HAC and volume control features; and
 - c) Any procedures for submitting or accessing information on HAC-compliant ACS telephonic CPE that will differ from the existing procedures for currently registered terminal equipment.



Progress by the ACTA – Database

- The report is to include the progress of any modifications necessary to accommodate HAC-compliant ACS telephonic CPE in the database, including any changes to how the ACTA will administer the database.
 - The ACTA established a Working Group (WG) to examine necessary changes to the ACTA processes and database to accommodate HAC-compliant ACS telephonic CPE.
 - As part of this work, the WG examined the database to determine how such equipment would be registered.
 - The ACTA determined that no significant modifications to the database are required. (Although, the ACTA is updating the user interface.)



Progress by the ACTA – Submitter Information

- The report is to contain the pertinent information that ACTA will request from responsible parties for ACS telephonic CPE, especially for the HAC and volume control features.
- The ACTA will request the same information as is currently requested during the filing process. This includes:
 - Name, address, and contact information of Organization Granting Approval
 - Telecommunication Certification Body (TCB) Identification Number
 - Declaration of Conformity Included?
 - Terminal Approval Date
 - Product Identifier
 - Name, address, and contact information of Responsible Party & U.S. Product Information Contact
 - Equipment Description
 - Country Of Origin
 - Responsible Party Code (RPC)
 - Manufacturer's Code (if available)
 - Current Authorization Number (only if Modification, Notice, Re-certification, and/or Re-declaration filing)



Progress by the ACTA – Submitter Information (cont'd)

- Responsible party submitter information (cont'd):
 - Equipment Code
 - List of Brand or Trade Name(s), Including New and Existing Names
 - List of New and Existing Model Number(s) for Each Brand or Trade Name
 - Network address signaling code
 - AC Ringer Equivalence Number (REN)
 - Hearing Aid Compatibility?
 - Universal Service Ordering Code (USOC) Jack(s)
 - Repetitive Dialing to a Single Number
 - Filing Status (original, notice of change, etc.)
 - Facility Interface Code(s)
 - Manufacturer Port ID
 - Service Order Code(s) (SOC)
 - Answer Supervision Code(s)
 - Ancillary Equipment (if applicable)



Progress by the ACTA – Procedures

- The report is also to include any procedures for submitting or accessing information on HAC-compliant ACS telephonic CPE that will differ from the existing procedures for currently registered terminal equipment.
 - To accommodate the registration of such equipment, the ACTA has updated its:
 - [Submission Guidelines and Procedures](#)
 - [Operating Principles and Procedures](#)
 - The updates apply the same processes and procedures to the registration of such ACS equipment that applies to other TTE equipment.
 - The proposed revisions are expected to be approved August 31, 2018.
 - The ACTA is proposing to charge the same fee for registering HAC-compliant ACS telephonic CPE as for other equipment.



Progress by the ACTA – Registration Process

- Under the ACTA procedures, a manufacturer would follow these steps to register and access registered information:
 1. Interested Parties would obtain a filer account from the ACTA Online Filing (AOF) system.
 2. Once approved, new filers have various filing options, depending on their specific needs:
 - a. Obtain a Responsible Party Code
 - b. New Original Filings
 - c. Modification Filings
 - d. Notice of Change Filings
 - e. Recertification/Re-Approval filings
 - f. RPC Data Validation Filings
 3. During the filing process, filers may submit any required documents (Supplier's Declaration of Conformity or TCB Certificate).
 4. Filers may review their submission prior to submitting payment.
 5. Upon successful completion, filers receive confirmation of their filings.



Progress by the ACTA – Technical Criteria

- The ACTA identified that new technical requirements may be necessary for registration of ACS equipment. The ACTA therefore requested Telecommunications Industry Association (TIA), which develops technical criteria for TTE, to review its requirements.
 - TIA reviewed and updated TIA-168-C-1, *Telecommunications – Telephone Terminal Equipment – Labeling Requirements – Addendum 1*.
 - Added definition for “ACS.”
 - Updated and broadened description for labeling equipment codes “IP”, “IS”, and “IT” (for VoIP equipment) to ensure codes would apply to VoIP equipment that provides communication via the PSTN or via ACS.



Open Issues

- Does the Commission have an estimate of the number of pieces of equipment that might expect to be registered?
- Is a HAC identifier on the product registration needed beyond what is already in place that the ACTA needs to include as part of the registration?



Conclusion

- The ACTA is prepared to accommodate the inclusion of HAC-compliant ACS telephonic CPE.
- All necessary updates are scheduled to be completed by December 31, 2018.
- The ACTA is preparing a Public Notice on this matter and would welcome the opportunity to draft and/or distribute this jointly with the Commission.
- The ACTA would welcome the opportunity to work with the Commission to inform and educate manufacturers on the new registration requirements.



Questions?

- **Scott Lambert**
ACTA Chair
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- **Tom Goode**
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- **Mark Cassarino**
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