



18 January 2022

Federal Communications Commission
Office of the Secretary
45 L Street NE
Washington, DC 20554

To Marlene H. Dortch, Secretary,

TDI has met with the Project IRIS team, led by Dr. Gary Behm at the Center on Access Technology at National Technical Institute for the Deaf at Rochester Institute of Technology (NTID/RIT), several times to learn about the technology creating a one-number solution that can be natively deployed in smartphones. This would allow consumers to receive calls at a selected mobile number while choosing a telecommunication application to answer the call. The successful deployment of Project IRIS will bring the deaf and hard of hearing community's telecommunications experience one step closer to an equitable experience.

Telecommunications Relay Service (TRS) users are currently given multiple phone numbers by TRS providers to use relay services. A TRS user with two IP-CTS and two VRS applications typically have at least five phone numbers to receive calls, and seldomly share their direct cellular number to the general population. Project IRIS will allow TRS users to comfortably distribute their cellular number to anyone. That way, when an inbound call arrives, TRS users can freely choose which telecommunication application to answer the call instead of being forced to submit to complex relay parameters

While call forwarding is an option, one that most IP-CTS users already have, it is not an infallible solution. Furthermore, call forwarding does not benefit VRS users, because it can be an awkward and cumbersome experience for users unfamiliar with native dialing systems. There are times when call forwarding lines become disconnected and the consumer is unaware until after a period of time they realize they are not receiving calls. This has resulted in lost job opportunities, confusion in medical appointments, and other life-affecting obstacles.

Deaf and hard of hearing consumers must have the same equitable experience as hearing consumers in making telephone calls. This means having *one number* to share with anyone — and to receive every call without glitch. Deaf and hard of hearing consumers should not be tasked with having to remember multiple telephone numbers and deciding which number to give to which party and explaining, "Only use this number to text me; if you want to call me, use that number." There is no other telecommunications user that is burdened with that process, unfairly singling out deaf and hard of hearing people in numerous ways.

This is why TDI fully supports Project IRIS and the equity it will bring to the 48 million deaf and hard of hearing phone users in the nation. We ask the Commission to encourage industry to work with the Center on Access Technology and explore implementation of this technology across all smartphones.

All for Access,

Eric Kaika
Chief Executive Officer