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June 30, 1998

BY HAND DELIVERY

Ms. Magalie Roman Salas
Secretary
Federal Communications Commission
Room 222
1919 M Street, N.W.
Washington, D.C. 20554

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

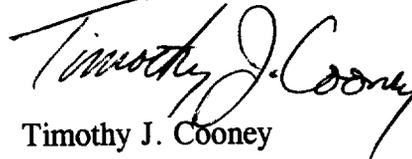
Re: WT Docket No. 96-198

Dear Ms. Salas:

I enclose for filing in the above-captioned rulemaking proceeding an original and five copies of the comments of the Association of Access Engineering Specialists (AAES).

Please telephone the undersigned if you have any questions.

Sincerely,


Timothy J. Cooney

TJC/mtd
Enclosures

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**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

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JUN 30 1998

**FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY**

**In the Matter of)
)
Implementation of Section 255 of the)
Telecommunications Act of 1996)
)
Access to Telecommunications Services,)
Telecommunications Equipment, and)
Customer Premises Equipment)
By Persons with Disabilities)**

WT Docket No. 96-198

**COMMENTS OF THE
ASSOCIATION OF ACCESS ENGINEERING SPECIALISTS (AAES)**

The Association of Access Engineering Specialists (AAES) is pleased to file these initial comments in response to the Notice of Proposed Rulemaking, FCC 98-55, issued in the above-captioned docket. We appreciate this opportunity to provide the FCC (the Commission) with comments on the implementation of Section 255 of the Communications Act of 1934, as amended (the Act).

AAES would like to thank the Commission for its recognition and encouragement of our efforts, stated in paragraph 160 of the NPRM. AAES was, in fact, founded based on several models which the Commission and the Architectural and Transportation Barriers Compliance Board (Access Board) themselves provided for consensual and cooperative development of various areas of regulatory interest. We note the close and productive working relationship the Commission has had for many years with various

professional engineering societies, such as the societies of the Institute of Electrical and Electronic Engineers (IEEE). In the area of voluntary standards organizations, there is a long history with various American National Standard Accredited (ANSI) standard-setting bodies such as those in the IEEE, the Telephone Industry Association (TIA) and others. In addition, the Commission has made use of outside expertise in responding to questions related to assessment of compliance, such as the ANSI C63 sub-committee which provides opinion, when requested, on how testing for compliance with FCC Part 15 should be conducted. AAES was founded based upon the firm belief that such cooperative working relationships result in the best and most refined regulatory implementation.

We will restrict our comments to those matters where we believe this association may be most involved. However, a brief history and overview of AAES may be in order. AAES was founded to assist in the development of the field of telecommunications access, provide education in access design and encourage dialogue between all affected parties with the purpose of constructing consensus solutions to access issues.

The concept for AAES was developed during the deliberations of the Telecommunications Access Advisory Committee (TAAC), which was convened by the Access Board. A number of the participants felt that there was a need to establish a neutral coordination point, where all affected parties could meet and develop the field of telecommunications access. From these discussions two organizations were approached with a request that they jointly establish such an organization. The National Association of Radio and Telecommunications Engineers (NARTE) was selected for its long history with administering certification and credential programs and the technical expertise of its members in the telecommunications arena.

The Rehabilitation Engineering and Assistive Technology Society of North America (RESNA) was selected as the primary organization representing professionals in the field of rehabilitation and assistive technology. Together these two organizations represent the two areas of technical expertise which are needed in order to effectively address access questions. AAES was established as a sub-society of NARTE, with by-laws approved by that board after review by the RESNA board. A formal Memorandum of Understanding has been executed between RESNA and NARTE, providing the formal basis for this partnership. However, while NARTE and RESNA are the founding hosts, AAES, by design, is inclusive. Many disciplines, interests and viewpoints must be involved if disability access to telecommunications is to be effectively developed. For this reason AAES is actively exploring ways in which it can effectively partner with all involved organizations. However, AAES is not an organization of organizations but a technical society with individual membership. It is a place where those working in the many aspects of this field can join together, dialogue, develop consensus and develop this field. It is interesting to note that the first member of AAES is a disability advocate. The second and third were from two of the largest telecommunications equipment manufacturing companies. Other members quickly joined from the telecommunications carriers, academia, research centers, fields of adaptive technology and other areas. It is with great pleasure that we can report that the goal of inclusive cooperation in this venture is being realized.

With this background we would comment positively upon the proposal set forth in paragraph 160- 16 1 of the NPRM. First, we would comment that before complaints are considered there is a need to establish common expectations. Exactly what does readily achievable access look like in 1998 for the various classes of equipment covered by this action? What techniques and technologies are available to implement access today? It is because of the

importance of these and many other related questions that AAES has selected educational workshops as its first projects. The first of these workshops was held in August of 1997 and the second will be held on June 29-30 of this year. We believe that much work remains to be done in developing a common understanding of what readily achievable access means, in terms of specific product realizations.

Secondly, should the Commission find the involvement of a neutral party in an alternative dispute resolution process **useful**, AAES is willing to serve such a function. We believe, at this time, our membership is uniquely constituted to serve such a purpose.

Third, we note that it may be most effective to refer some questions for consideration in advance of any complaints. Certainly a number of important questions can be recognized now. By developing a body of consensus opinion, before complaints are filed benefits all parties by providing a more secure and certain basis upon which to act. Those of our members who helped draft the section of the TAAC report cited in paragraph 16 1 state that just such a concept was contemplated there. It was, and is, believed that consumers and industry, in cooperation with Commission and Access Board staff, should be able to put forth inquiries, apart from filing complaints, and receive informed guidance which represents a balanced viewpoint. By developing consensus opinions on various questions, all parties are benefited. Industry will be able to develop its products and services with greater certainty. Consumers will know with greater specificity what to expect from the implementation of paragraph 255.

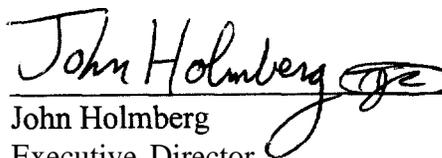
AAES believes that it is unique in providing an organization in which telecommunications engineers, consumer representatives, rehabilitation engineers, designers of

assistive technology and regulators come together on an equal and cooperative basis. We look forward to serving our members and the Commission in developing consensus opinions and assisting in the effective and efficient development of telecommunications access.

AAES thanks the Commission for this opportunity to comment on this most important matter. We look forward to working with the Commission and its staff in the successful development of telecommunications access for all of America's citizens.

Respectfully submitted,

**THE ASSOCIATION OF ACCESS
ENGINEERING ACCESS SPECIALISTS**

A handwritten signature in cursive script that reads "John Holmberg" followed by a stylized flourish.

John Holmberg
Executive Director
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June 30, 1998