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April 15, 2008

Donna Nangle
National Institute on Disability and Rehabilitation Research (NIDRR)
U.S. Department of Education
400 Maryland Avenue, S.W.
Room 6029
Washington, D.C. 20202

Re: Update of NIDRR Long-Range Plan

Dear Ms. Nangle,

The Telecommunications Industry Association (TIA) is pleased to submit comments in response to the notice of request for comments on the update of the National Institute on Disability and Rehabilitation Research (NIDRR) Long-Range Plan for fiscal year 2005-2009.¹

The Telecommunications Industry Association is the leading trade association for the information, communications and entertainment technology industry, representing over 600 member companies. TIA serves industry suppliers to global markets through its leadership in standards development, domestic and international policy advocacy, and facilitating member business opportunities. TIA represents providers of information, communications and entertainment technology products and services for the global marketplace through its core competencies in standards development, domestic and international policy advocacy, and facilitating member business opportunities. The association facilitates the convergence of new communications networks while working for a competitive and innovative market environment.

TIA commends the NIDRR plan for focusing its research on Capacity Building, Research and Development (R&D), and Knowledge Translation so that the outcomes can be used to create equal access to employment, health and function, and community participation for people with disabilities. As noted in the plan, technology can be used improve limited mobility and manipulation, and sensory, cognitive, and emotional functions.² TIA member companies manufacture the technology that is currently used and will be

¹ National Institute of Disability and Rehabilitation Research—Notice of Final Long-Range Plan for Fiscal Years 2005-2009, 71 Fed. Reg. 31 (proposed Feb. 15, 2006) [hereinafter *Long-Range Plan*].

²*Id.* at 8171.

used in the future to improve the lives of Americans living with disabilities, in additions to standards development.³

The first step to developing an accessible product is R&D; however, there is currently very limited funding for research initiatives relevant to rehabilitation. This compounded with limited marketplace incentives for manufacturers, as recognized in the plan, hinders technological advancement for accessible products.⁴ NIDRR seeks to curb these factors through the Long-Range Plan.

The plan focuses on utilizing universal design to increase the amount of accessible devices and standards to improve the end-user experience.⁵ However, the plan stresses the importance of consumer involvement but fails to recognize the same need for industry involvement. One of most significant barriers in this area is lack of communication between the disability community and industry. TIA urges NIDRR to incorporate industry input at the R&D phase this will facilitate better communication, allowing manufacturers to focus product development in areas lacking in accessibility.

TIA has consistently contributed in efforts to harmonize current and emerging standards and technologies used for the accessibility of information and communications technology. Most recently, TIA participated as a committee member on the Telecommunications and Electronic Information Technology Advisory Committee (TEITAC) in its efforts to updated accessibility standards under section 508 of the Rehabilitation Act and guidelines under section 255 of the Telecommunications Act.

Additionally, TIA is accredited by the American National Standards Institute (ANSI) to develop voluntary industry standards for a wide variety of telecommunications products. TIA's Standards and Technology Department is comprised of ten technology areas which sponsor more than 70 standards formatting groups. TIA expertise in this area would be extremely beneficial to NIDRR's goals of increasing accessible devices and standards.

In conclusion, TIA stresses the importance of R&D in the NIDRR Long-Range Plan and the need to increase industry involvement in this process. TIA appreciates the opportunity to provide these comments and looks forward to collaborating with NIDRR in reaching its goals

Sincerely,

/s/ Rebecca Schwartz
Manager, Regulatory and Government Affairs
Telecommunications Industry Association

³ Please see Attachment A: Press Release, Telecommunications Industry Association, Cordless Phone Manufacturers to Make All Handsets TIA-1083 Compliant (Jan. 7, 2008) (on file with author).

⁴ *Long-Range Plan*, *supra* note 1, at 8188

⁵ *Id.*

[ATTACHMENT A]

January 7, 2008

Cordless Phone Manufacturers to Make All Handsets TIA-1083 Compliant

TIA's Interference Standard Quickly Becoming Ubiquitous in the Industry.

Arlington, Va. - The Telecommunications Industry Association (TIA) and the Hearing Loss Association of America (HLAA) announced today that Panasonic, Uniden, Thomson, and V-Tech will have 100% of their new cordless telephones comply with the TIA-1083 interference standard. This standard will curtail the interference experienced by cordless phone users with hearing aids and cochlear implants. These manufacturers have indicated phased-in commitments to 100% compliance, with most achieving it for new designs in 2008 and all expecting to comply by the beginning of 2010.

This milestone is the result of consistent, coordinated efforts by TIA, its members, HLAA and the Rehabilitation Engineering Research Center on Telecommunications Access at Gallaudet University. Collaboration between TIA, the communications industry and HLAA is productive on many levels. Good-faith negotiations allow all parties to avoid burdensome regulations that might have unintended consequences for consumers. Working directly with industry allows consumers with hearing loss to voice their concerns and see their suggested changes brought to market as quickly as possible.

TIA-1083, *Telephone Terminal Equipment Handset Magnetic Measurement Procedures and Performance Requirements*, defines measurement procedures and performance requirements for the handset generated audio band magnetic noise of wireline telephones. Simply put, applying the TIA-1083 standard to cordless phones significantly reduces the audio interference problems that had previously affected cordless telephone users with hearing aids and cochlear implants.

"TIA believes that the more people who can access the telecom network, the more powerful and useful that network is for everyone," said TIA President Grant Seiffert. "The success TIA and HLAA have had in working together to solve this potential problem is simply inspiring."

"This shows that industry and consumers can work together to bring accessible products to market," said Brenda Battat, associate executive director of HLAA. "As a result of this collaborative effort hearing aid and cochlear implant users now have more phone options."

For more information about TIA-1083 and TIA's work with the hearing loss community, please contact Florence Sumaray at 703.907.7471 or fsumaray@tiaonline.org.

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About TIA

For almost three decades, TIA has leveraged its global resources to create the best possible business environment within which our 500+ members can research, develop, manufacture, market and sell their products and services worldwide. The association accomplishes this through its expertise in standards, advocacy, business development, market intelligence, environmental compliance and information security. TIA is committed to expanding market opportunities while protecting and enhancing the reputation of the global communications industry with all its stakeholders. For more information, go to www.tiaonline.org.