

1 Currently the equipment distribution program overseen by Aging and Disability Services
2 Division (ADSD) provides various devices that communicate through a dual-party relay system,
3 but does not offer an option for wireless phones. The evolution of telecommunications devices
4 has progressed to the point where the functionality available on wireless phones can be widely
5 utilized and beneficial to persons who are deaf, hard of hearing or speech impaired (the
6 “Community”). In particular, smartphones offer a variety of services that include texting, video
7 and apps that are specifically designed for the Community. The Nevada Commission on Services
8 for Persons with Disabilities- Subcommittee on Communication Services for Persons who are
9 Deaf or Hard of Hearing and Persons with Speech Disabilities has appointed this working group
10 to deliberate on the feasibility of adding wireless devices to the existing equipment distribution
11 program.

12 Some states already offer a wireless option. In many regards Kentucky is quite similar to
13 Nevada. Kentucky does offer wireless phones as part of its telecommunications for their deaf
14 and hearing impaired program. The program is run by the Kentucky Commission on the Deaf
15 and Hearing Impaired Commission. The Executive Director of the Kentucky
16 Telecommunications Association is on the advisory board to the program. The program is
17 funded by a monthly surcharge on wireline and wireless customer bills. The state PSC
18 determines the surcharge amount; telecommunications carriers submit the funds to the Public
19 Service Commission (PSC) and Kentucky Commission for the Deaf and Hard of Hearing
20 (KCDHH) draws down funds via the state government accounting system. Kentucky initially
21 opposed adding wireless phones to the program because the surcharge was applied to wireline
22 only. Once parties agreed to expand the surcharge to wireless service, a joint legislative effort to
23 expand the program was passed. The wireless portion of the program has been very successful.
24 All phones in the program are provided via state contract.

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26 Kansas is similar to Nevada, but the Telecommunications Association in the state runs the
27 program. (The Nevada Telecommunications Association does not advocate this approach in
28 Nevada.) Kansas uses a distribution model in which the recipient then owns the equipment. In
29 Kansas, they simply reimburse the customer for the cost of the cell phone itself. The customer is
30 responsible for qualifying for the program, providing a service contract from a wireless phone
31 company of their choice and proof of purchase of the cell phone. The key is the customer must

32 apply to the program, be qualified and approved by them before they can get service and phone.
33 The phone must also contain either a physical or virtual keyboard for those with hearing loss.

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35 In order to administer a wireless option in Nevada there are numerous issues that need to be
36 considered. Among those:

37 1. What equipment model best fits wireless phone distribution in Nevada? There are
38 essentially two equipment models, loan and distribution. ADSD utilizes a loan model
39 with regard to TTY equipment today. In essence the Deaf Center owns the equipment
40 and allows the Community to use the equipment for as long as they like. If the
41 equipment is damaged or a different device is needed the client brings the device back
42 and receives another device. The states that offer a wireless option typically use an
43 owner-based distribution model. This is mainly due to service contracts customer sign
44 with wireless providers. An owner-based distributed model allows for either reimbursing
45 the client for the wireless device or working through the Deaf Center. In addition to Deaf
46 Centers, the community can also be served under Nevada's Assistive Technology
47 program (a separately funded program, not related to the TDD surcharge). Current
48 information regarding wireless telecommunication accessibility through Nevada's
49 assistive technology program from Easter Seals Nevada:

50 <http://wiki.eastersealsnevada.org/display/PUBLIC/Assisitve+Technology+Services#>

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52 2. Regardless of equipment model what wireless devices would be offered by the program?
53 Smartphones offer the greatest benefit to the Community, however; the functionality and
54 cost of smartphones vary. Does the Nevada Assistive Technology program provide
55 sufficient and appropriate choice for the target population, or does the TDD-funded
56 equipment program need to be expanded?

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59 3. Today the Deaf Centers train the Community on the use of TTY equipment. Some
60 members of the Community would certainly benefit from some type of wireless
61 equipment training. Should Deaf Centers that receive TDD surcharge funds assist the
62 Community with mobile app recommendations and training?

63 Nevada statute restricts the TDD program to equipment and relay-services. With the wireless
64 option, the customer would be responsible for qualifying for a service plan. Low-income
65 customers could be eligible to for Lifeline services, in the event that a mobile device plan was
66 too costly. The FFC and ADSD have been in contact and will continue to work together to close
67 the gap for atypical service applications for Lifeline. Frequently Asked Questions regarding the
68 Lifeline program: <http://transition.fcc.gov/cgb/consumerfacts/LifelineFAQs.pdf>

69 Aging and Disability Service Division (“ADSD”) has also contemplated whether a state
70 contract with a provider might assist the Community with procuring lower rate service plans that
71 meet their needs. As an example, Sprint offers a number of packages tailored specifically to the
72 Community’s requirements. The Community members would, of course, be free to choose any
73 provider.

74 NRS 427A.797 states the Public Utilities Commission of Nevada must approve the program
75 that provides equipment with TDD surcharge funds.