## Wireless

As the FCC considers the proposals in a further rulemaking on real-time text, it should ensure the rules "remain grounded in feasibility, subject to the statutory limitations on what is achievable and readily achievable," T-Mobile replied. "T-Mobile encourages the Commission to reject calls for expanding the scope of the backwards compatibility obligation as well as to refrain from adopting new and onerous mandates on carriers." The company said, for example, RTT can't be compatible with short-message service texting. "SMS and RTT are two entirely different communications protocols—SMS is a best-effort, store-and-forward service, while RTT is a session-based, two-way communication similar to voice calling," the carrier said. "Making RTT backwards compatible with SMS is not feasible." The Alliance for Telecommunications Industry Solutions agreed. "RTT and SMS are two different technologies—end-users make a choice regarding which technology to use and there is no way for service providers to automatically revert messages sent using one technology to another," ATIS replied. "An RTT message therefore cannot automatically fall back to SMS." The National Emergency Number Association in general supported an FCC proposal that it set a sunset date of 2021 for traditional text telephony (TTY), which RTT is replacing. "The Commission should carefully track data trends among consumers, access network providers, originating service providers (such as over-the-top RTT services), and [public safety answering points]," NENA wrote. "If it appears, closer to the tentative sunset date, that any one of these important constituencies has not yet adequately transitioned to technologies and business practices that natively support RTT, the Commission should be prepared to postpone the sunset for a limited time." In December, the FCC approved an order on a common standard for the transition from TTY to RTT and asked a number of questions in an FNPRM (see 1612150048). Replies were due Friday in docket 16-145. —*HB*