



Nothing about us without us!

August 10, 2015

Thomas Wheeler
Chairman
Federal Communications Commission
445 12th Street SW, Washington, D.C. 20554

Dear Chairman Wheeler,

The Autistic Self Advocacy Network (ASAN), the leading autistic advocacy organization run by autistic people, asks that the Federal Communications Commission (FCC) confirm that persons with autism spectrum disorder (ASD) and sensory processing disorder (SPD) are eligible to obtain the use of Telecommunications Relay Services. These services are critical to individuals whose sensory or speech difficulties make use of a telephone difficult or impossible.

The Communications Act, 47 U.S.C. § 255(c), states that “[a] provider of telecommunications service shall ensure that the service is accessible to and usable by individuals with disabilities, if readily achievable.” The FCC has interpreted this requirement to include provision of Telecommunications Relay Services for individuals with “a hearing or speech disability” who require such services in order to “engage in communication by wire or radio with a hearing individual in a manner that is functionally equivalent to the ability of an individual who does not have a hearing or speech disability to communicate using voice communication services by wire or radio.” 47 C.F.R. § 64.601.

ASD has been linked to significant impairments in auditory processing, which can make speech difficult to understand.¹ SPD, by definition, also often results in auditory processing difficulties. Autistic individuals may also require typed text, sign language or picture boards in order to speak.² Autistic individuals with auditory processing or speech-related impairments and individuals with SPD should, as a result, be considered to have either a hearing disability, speech disability, or both. This interpretation is consistent with language in 47 U.S.C. § 255, which broadly requires that telecommunications services be accessible to people with disabilities in general, as long as any necessary accommodations are readily achievable.

¹ Courchesne, E. (1987). A neurophysiological view of autism. In E. Schloper & G.B. Mesibov (Eds.), *Neurobiological Issues in Autism*. New York: Plenum Press.

² Cafiero, J. (2001). The Effect of an Augmentative Communication Intervention on the Communication, Behavior, and Academic Program of an Adolescent with Autism. *Focus on Autism and Other Developmental Disabilities*, 16(3), 179-189.

Providing existing relay services to people with ASD or SPD is readily achievable. These services already must be made available to people with other hearing or speech disabilities. Many telecommunications providers have already adopted a policy of providing relay services to autistic individuals, with the expectation that the FCC will require it.

We ask that the FCC confirm that individuals with ASD or SPD are entitled to access telecommunications relay services when these services are needed in order to ensure access to communications services. We would greatly appreciate an opportunity to meet in person to discuss this matter in the near future.

Thank you,

A handwritten signature in black ink, appearing to read "Samantha Crane". The signature is fluid and cursive, with a long horizontal stroke at the end.

Samantha Crane
Director of Policy
Autistic Self Advocacy Network

Cc: Karen Peltz Strauss
Deputy Bureau Chief
Consumer and Governmental Affairs Bureau
Federal Communications Commission