



The Voice Option in Customer Service Must Not Be the Only One

Sometimes keypads are necessary. They cannot be taken out of the service equation

Who are the geniuses at AT&T who removed an entire method of communication from its company's customer service, and when will the company fix this inexcusable error?

According to AT&T, in 3Q 2016, more than 99 percent of Americans were covered by the company's network. There were an estimated 144 million AT&T wireless customers in the U.S. and Mexico and more than 390 million people in those countries could access AT&T's 4G LTE network.

Previously, when customers called AT&T, they were able to use dual-tone multi-frequency (DTMF) or interactive voice response (IVR) to transact their business—whether it was to pay bills, upgrade service, or call with questions. But by fourth quarter 2016, if not before, AT&T removed the DTMF option, precluding customers from using the buttons on the keypad, instead requiring users to speak. Out loud. Regardless of whether it is a convenient option.

AT&T's removal of DTMF "sounds like a violation" of FCC rules, experts say.

"You don't have to press buttons," the AT&T interactive voice menu (IMS) informs callers. "You can talk to me like I'm a real person."

Great. But you're not a real person. And I do not want to talk to you. I *want* to press buttons.

There are more reasons a caller might prefer DTMF than there are numbers on a keypad: On a train. In a waiting room. Laryngitis. Brain injury. Cerebral palsy. Autism. Really tired after a long day. Just don't feel like talking. The list goes on.

Many people dislike DTMF, and IMS allows those users to circumvent it. But DTMF was already there. It was already functional. It already serviced a vast number of customers. Why remove it?

It is estimated that 14.9 million, or 6.2 percent of people 15 years and older, have difficulty seeing, hearing, or having their speech understood; 2.8 million of those people (1.2 percent) are the ones who have difficulty having their speech understood, according to the 2010 census. There are untold others who have difficulty speaking even though their speech is understood by others. And that's just in the United States. So, based on AT&T's own calculations, more than 2.77 million people are negatively impacted by its removal of DTMF.

Does AT&T hate us disabled folks? Probably not. Could there possibly be that many ignorant people in one room? Doubtful. Why, then, would AT&T engage in such a myopic

move? It could have to do with Big Data. And it definitely triggers anti-discrimination laws.

It is bad business to discriminate. Companies shouldn't care if a customer or prospect is black, white, or purple; if he has a disability or is able-bodied; if she likes pizza or hates baseball. The more people to whom a company caters, the greater the probability the company will make money. And comply with the law.

The Federal Communication Commission (FCC) regulates IMS in its rule mandating that providers of IMS ensure the service is accessible to and usable by individuals with disabilities, if readily achievable.

Multiple experts agree that AT&T's removal of DTMF "sounds like a violation" of FCC rules because "if somebody with a speech disability calls the company, [he or she] is not able to access its services," according to one source.

The fact that AT&T already provided DTMF "suggests evidence that it was readily achievable," according to FCC sources. "It certainly indicates it was feasible."

Providers must include at least one mode that does not require user speech. Pressing zero to opt out doesn't count because it doesn't make IMS accessible; it's an alternative solution and not what was intended by the FCC rule.

The provider is the entity hosting the IMS. Guess what, IVR companies? If you're the one hosting the solution, you're the one on the hook when the FCC comes knocking.

According to the rule, "[Providers should] evaluate accessibility, usability, and compatibility of their services and incorporate that evaluation...as early and consistently as possible...identifying barriers to accessibility and usability as part of their product design and development process." They might also consider including disability-related organizations and people with disabilities in the process.

One thing is certain: Providers should not rely on the FCC to tell them how to make their IMS compliant. There are assistive technology experts who work in IT, technology, software, and the like. Providers should engage the services of these experts to ensure the IMS solutions comply with the law *and* provide an accessible, usable means for all callers to autonomously engage in the social experience.

AT&T invested \$140 billion in its wireless and wireline networks between 2011 and 2015. Maybe it should invest a little in accessible design. ☒

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