



# Fall 2018 TRS Advisory Council FCC Update

ELIOT GREENWALD  
DISABILITY RIGHTS OFFICE  
CONSUMER AND GOVERNMENTAL AFFAIRS BUREAU  
FEDERAL COMMUNICATIONS COMMISSION

September 13, 2018

Fall 2018 TRS Advisory Council Meeting



# TRS PROGRAM RECERTIFICATION

- On July 16, 2018, the Consumer and Government Affairs Bureau (CGB) released a public notice granting certification to each state and territory that sought to renew its TRS program. After reviewing each application, CGB determined:
  - The TRS programs of the listed states meet or exceed all operational, technical, and functional minimum standards contained in section 64.604 of the Commission's rules;
  - The TRS programs of the listed states make available adequate procedures and remedies for enforcing the requirements of their state programs; and
  - The TRS programs of the listed states in no way conflict with federal law
- The certifications will remain in effect for a five (5) year period, beginning July 26, 2018, and ending July 25, 2023
- Beginning one year prior to the expiration of the certifications, July 25, 2022, each state may apply for renewal of its TRS program certification

# TRS RATE ORDER

- On June 29, 2018, CGB adopted an Order establishing per-minute compensation rates for TRS that are supported by the Interstate TRS Fund for the Fund Year beginning July 1, 2018 and ending June 30, 2019
- The per-minute compensation are:
  - Traditional TRS - \$3.2592
  - STS - \$4.3902
  - CTS - \$2.007
  - IP CTS - \$1.75 (adopted by the Commission in the IP CTS reform order on June 7, 2018)
  - IP Relay - \$1.40
  - VRS (adopted by the Commission in the July 6, 2017 VRS rate order) -
    - \$5.29 Emergent Tier (1st 500,000 monthly minutes) for VRS providers with 500,000 or fewer minutes in a month
    - \$4.82 Tier I (1st 1,000,000 monthly minutes) for VRS providers with more than 500,000 minutes in a month
    - \$3.97 Tier II (1,000,001 to 2,500,000 monthly minutes)
    - \$2.83 Tier III (monthly minutes exceeding 2,500,000)
- CGB also adopted a TRS funding requirement of \$1,497,699,377 and a carrier contribution factor of 0.02801 for the Fund Year

# TRS EQUAL ACCESS AND BILLING OPTIONS WAIVERS

- On August 8, 2018, CGB released an Order extending waivers that were previously granted to Sprint Communications and Hamilton Relay Inc.
- These waivers relieved providers of traditional TRS, speech-to-speech relay service (STS), and non-Internet Protocol (IP) forms of captioned telephone service (CTS) of the requirements to offer consumers their choice of long distance carrier (equal access rule) and multiple billing options for long distance calls as long as the providers do not charge for long distance service
- The waivers will expire on August 24, 2019 or the effective date of a Commission decision on the continued application of the waived standards, whichever is earlier

# AT-HOME VRS CALLING HANDLING PILOT

- On October 31, 2017, the FCC released a public notice authorizing ZVRS and Purple to participate in the VRS at-home call handling pilot program
- The pilot program began on November 1, 2017 and will end on October 31, 2018
- On August 29, ZVRS and Purple filed a petition to make the at-home call handling program permanent and to extend the pilot program through December 31, 2020, while the petition is pending
- The Commission is considering whether to extend the pilot program and may soon seek comment on whether to make the at-home call handling program permanent

# TRS USER REGISTRATION DATABASE

- On June 26, 2018, CGB released a public notice inviting comment on a petition filed by five video relay service (VRS) providers
- The VRS providers request a limited waiver of the Commission's rules to permit them to provide service to a new user, or to a user whose VRS telephone number has been ported from another provider, while that user's verification through the TRS-URD is pending, subject to the calls being compensable only if the user is verified
- The comment period closed on August 10, 2018, and the item is pending.

# SUSPENDING RUE PROFILE COMPLIANCE

- The Interoperability Profile for Relay User Equipment (RUE Profile) is a technical standard incorporated into the FCC's rules to support VRS interoperability
- On April 26, 2018, CGB released an Order suspending for one year, until April 29, 2019, the deadline for video relay service (VRS) provider compliance with the RUE Profile

# CALL CENTER NOTIFICATION WAIVER

- VRS providers are required to provide 30 day advanced notification to the FCC and the TRS Fund administrator when the provider opens, closes, or relocates a video relay service (VRS) call center
- On June 4, 2018, ZVRS relocated a call center for which it provided 30 days advanced notification to the Commission, but not to the telecommunication relay service (TRS) Fund administrator
- On August 30, 2018, CGB released an Order granting ZVRS and Purple limited waivers of the call center notification rule and the compensation payment rule to allow the companies to be compensated for VRS calls handled at the relocated call center



# MITRE ASSESSMENT OF IP CTS

- On April 11, 2018, the Managing Director and CGB announced the release of two summaries prepared by the MITRE Corporation detailing the results of the first two phases of independent testing performed to assess the quality and usability of Internet Protocol Captioned Telephone Service (IP CTS) devices and services, as well as automated speech-to-text (STT) technologies

# IP CTS REFORM ORDER

- On June 7, 2018, the FCC adopted a Report and Order, Declaratory Ruling, Further Notice of Proposed Rulemaking, and Notice of Inquiry addressing IP CTS
- The Report and Order revises the rate methodology used to compensate IP CTS providers, sets interim IP CTS provider compensation rates for the next 2 years, and adopts rules to limit unnecessary IP CTS use and waste of the TRS Fund
- The Declaratory Ruling authorizes the use of and compensation for fully automated speech recognition (ASR) to produce captions for IP CTS calls. Providers must first be approved to use this method by CGB

# IP CTS REFORM ORDER (2)

- In the Further Notice of Proposed Rulemaking, the Commission seeks additional comment on various aspects of the IP CTS program, including compensation, funding, administration, provider practices, and 911 call quality
  - The deadline to file comments is September 17, 2018
  - The deadline to file reply comments is October 16, 2018
- In the Notice of Inquiry, the Commission seeks comment on establishing IP CTS performance goals and metrics to ensure service quality for users and evaluate the efficacy of the IP CTS program
  - The deadline to file comments is October 16, 2018
  - The deadline to file reply comments is November 15, 2018

# IP CTS REFORM ORDER (3)

- On August 6, 2018 CGB released a public notice seeking comment on:
  - Sprint's petition for clarification, or in the alternative, reconsideration of the *2018 IP CTS Declaratory Ruling* on the use of automatic speech recognition; and
  - Sprint's petition for reconsideration of interim compensation rates established in the *2018 IP CTS Report & Order*. Sprint requests that the Commission freeze the rate at the prior \$1.9467 level, pending resolution of the compensation issues raised in this proceeding
- The comment period on these petitions closes September 17, 2018

# REAL TIME TEXT (RTT)

- CGB and the PSHSB, with the assistance of the DAC, will host a workshop for public safety answering points (PSAPs) about RTT on October 2, 2018, from 12:30 p.m. to 4:30 p.m. Eastern Time.

# EMERGENCY COMMUNICATIONS

- The FCC has held workshops, released reports, and adopted Notices of Inquiry, Notices of Proposed Rulemakings, Orders, and Public Notices that raised questions or addressed disability access including:
  - Public Notices seeking to refresh the record on facilitating multimedia content in WEA
  - A workshop to identify communication needs during disasters
  - A report on the false emergency alert in Hawaii
  - A roundtable on emergency alerting
  - A report on the 2017 Nationwide test of EAS

# EMERGENCY COMMUNICATIONS (2)

- The FCC has held workshops, released reports, and adopted Notices of Inquiry, Notices of Proposed Rulemakings, Orders, and Public Notices that raised questions or addressed disability access including:
  - An Order granting waiver of certain accessibility requirements for emergency information on television
  - Public Notice on the nationwide test of the WEA system and a nationwide test of EAS on September 20, 2018, with an alternate test date of October 3, 2018
  - Public Notice reminders to make televised emergency information available

# INTEROPERABLE VIDEO CALLING WORKING GROUP

- On July 3, 2018, FCC Chairman Ajit Pai announced that the FCC is seeking nominations for membership on a new Interoperable Video Calling (IVC) Working Group that will explore how to achieve interoperable video calling using 10-digit telephone numbers
- The Commission welcomes participation by parties who have an interest in developing and integrating video calling systems used by both hearing individuals and people with hearing and speech disabilities who may currently use incompatible equipment and services
- The Nominations period closed on July 31, 2018
- Membership will be announced soon



# 2018 CVAA BIENNIAL REPORT

- On August 9, 2018, CGB released a Public Notice seeking comment on tentative findings for the 2018 Twenty-First Century Communications and Video Accessibility Act (CVAA) Biennial Report. The report to Congress is due October 8, 2018.
- These tentative findings address:
  - The level of compliance with accessibility requirements for telecommunications and advanced communications services and equipment, and Internet browsers built into mobile phones;
  - The extent to which accessibility barriers still exist with respect to new communications technologies; and
  - The effect of accessibility recordkeeping and enforcement requirements on the development and deployment of new communications technologies
- The comment period closed on August 23, 2018

# DISABILITY ADVISORY COMMITTEE (DAC)

- On Monday, April 9, 2018, the Technology Transitions Subcommittee of the Disability Advisory Committee held an invitation only roundtable at the FCC, on using RTT with refreshable Braille screen readers
- On August 21, 2018, the FCC released a Public Notice inviting application for membership for the next two year term of the DAC. Applications may be submitted through the online application portal at [www.fcc.gov/dac/application](http://www.fcc.gov/dac/application) (preferred), or by email to [DAC@fcc.gov](mailto:DAC@fcc.gov)
- The final DAC Meeting of the current term will be held on October 3, 2018. It is anticipated the members will vote on recommendations concerning measures and metrics for TRS, RTT and refreshable Braille displays; RTT integration with TRS; and the availability of TRS in emergency shelters

# CHAIRMAN'S AWARDS FOR ADVANCEMENTS IN ACCESSIBILITY

- Recognizes the efforts of individuals, organizations, academic institutions, companies, and government agencies that produce innovations to make communications tools more accessible to people with disabilities
- FCC Chairman Ajit Pai announced this year's winners at an awards ceremony at the M-Enabling Conference in Arlington, Va. The 2018 winners included:
  - Orbit Reader 20 – a refreshable Braille display and notetaker with a significantly reduced price point for this type of accessible technology
  - Captioning and Description Editing Tool (CADET) – a free program for closed captioning and video description
  - Content Clarifier – an accessible technology that simplifies, summarizes, and augments digital content to increase comprehension for people with cognitive disabilities, the aging population, or those learning English as a second language
  - Seeing AI – a free app that narrates the visual world to improve accessibility and independence for blind and low vision individuals
- For more information, please visit:  
[www.fcc.gov/general/chairmans-awards-advancements-accessibility](http://www.fcc.gov/general/chairmans-awards-advancements-accessibility)

# ASL VIDEO LIBRARY

- On February 9, 2018 DRO Launched a new ASL Video Library webpage
  - <https://www.fcc.gov/asl-video-library>



# INFORMATION AND RESOURCES

- Subscribe to [AccessInfo@fcc.gov](mailto:AccessInfo@fcc.gov). Keep current on all FCC proceedings and events on disability-related issues
- FCC – Disabilities Rights Office Webpage: <https://www.fcc.gov/disability>
  - [DRO@fcc.gov](mailto:DRO@fcc.gov) (e-mail)
  - 844-432-2275 (videophone)
  - 202-418-2517 (voice)
  - 888-835-5322 (TTY)
- Online Complaint Form: [www.fcc.gov/complaints](http://www.fcc.gov/complaints)
- [Eliot.Greenwald@fcc.gov](mailto:Eliot.Greenwald@fcc.gov) 202-418-2235