

iTRS VRS User and Device Registration Database

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iTRS VRS Registration Database

- Timeline

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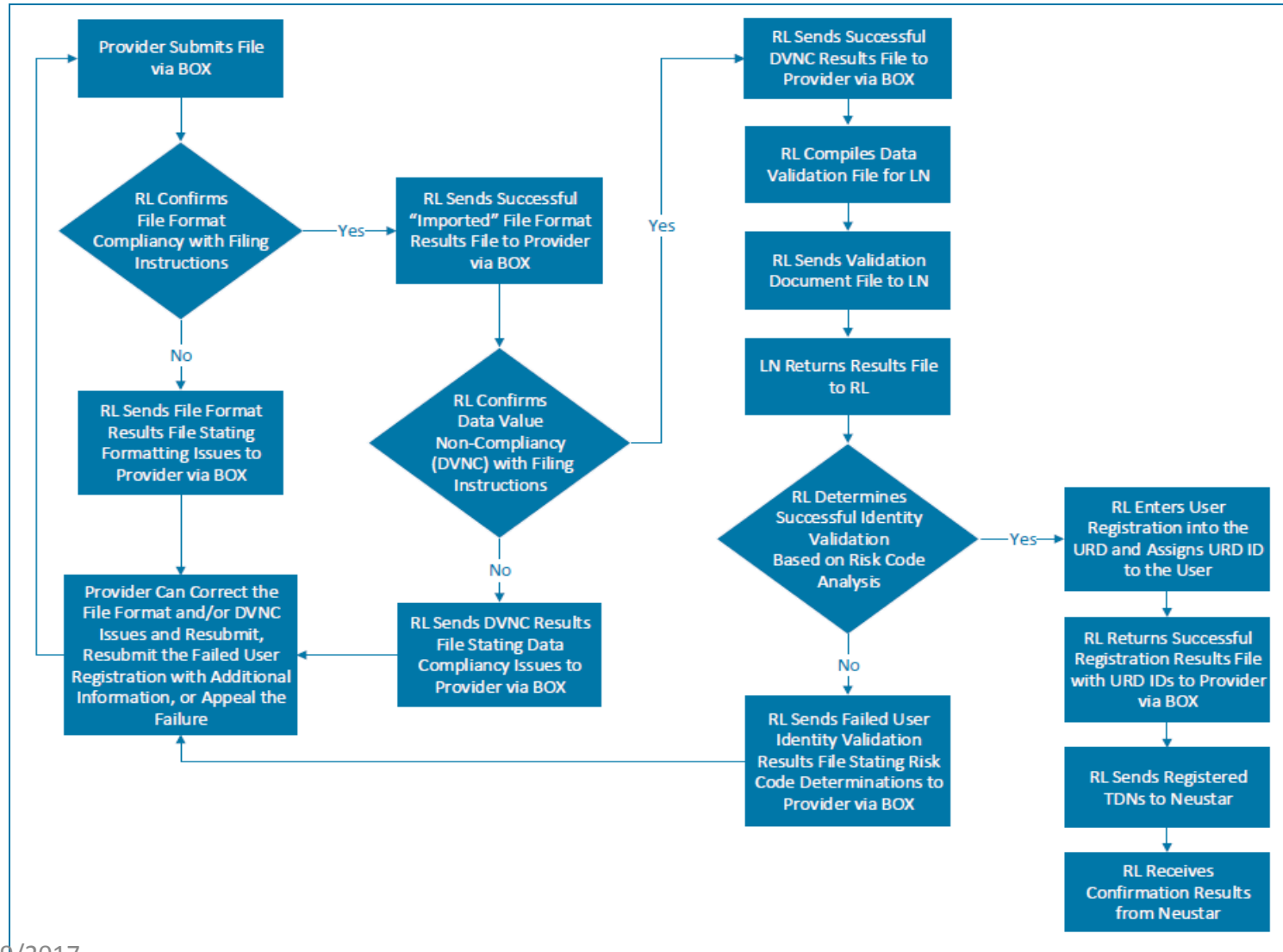
Timeline

- RL is awaiting confirmation on the proposed additional fields for enterprise phones and a clarification on hearing user registration data requirements mentioned within the March 23rd FNPR (FCC 17-26).
 - The added fields and data processing changes will require approximately ~60 additional days of code modifications and testing with the providers to implement.
- Testing will continue until the FCC notice is issued for the 60 day window opening for registration submission of VRS users and devices.

Processing Summary

- RL has created text file formats and instructions for submission of user and device registrations including :
 - Existing Registrations
 - New Registrations
 - Ported TDNs
 - Updates to User/Device Information
 - Terminations
 - Transfers (transfer of TDN ownership while retaining same provider)

Processing Summary – Users



Processing Summary - Users

- Data sent from Providers to RL include:
 - RegistrationRequestID – created/prepared by the provider
 - Name
 - Residential Address
 - Registering Address
 - Last 4 of SSN/Tribal Identification#
 - Date of Birth (DOB)
 - Identity validation TDN
 - TRS TDN
 - Service Initiation Date
 - Date of Last Activity
 - Consent Date
 - Self-Certification Date
 - Hearing User Indicator Field
 - Self-Certification PDF Document
 - If applicable - Minor DOB
 - If applicable – Ported Consent Date
 - If applicable – Ported Confirmation Number

Processing Summary - Users

- Data sent from RL to identity validation 3rd party:
 - Name
 - Residential Address
 - Last 4 of SSN/Tribal Identification#
 - Date of Birth (DOB)
 - Identity validation TDN

- Data sent from RL to the iTRS Administrator (Neustar):
 - TDN
 - Provider XSID
 - Service Indicator
 - Action Code

Processing Summary - Users

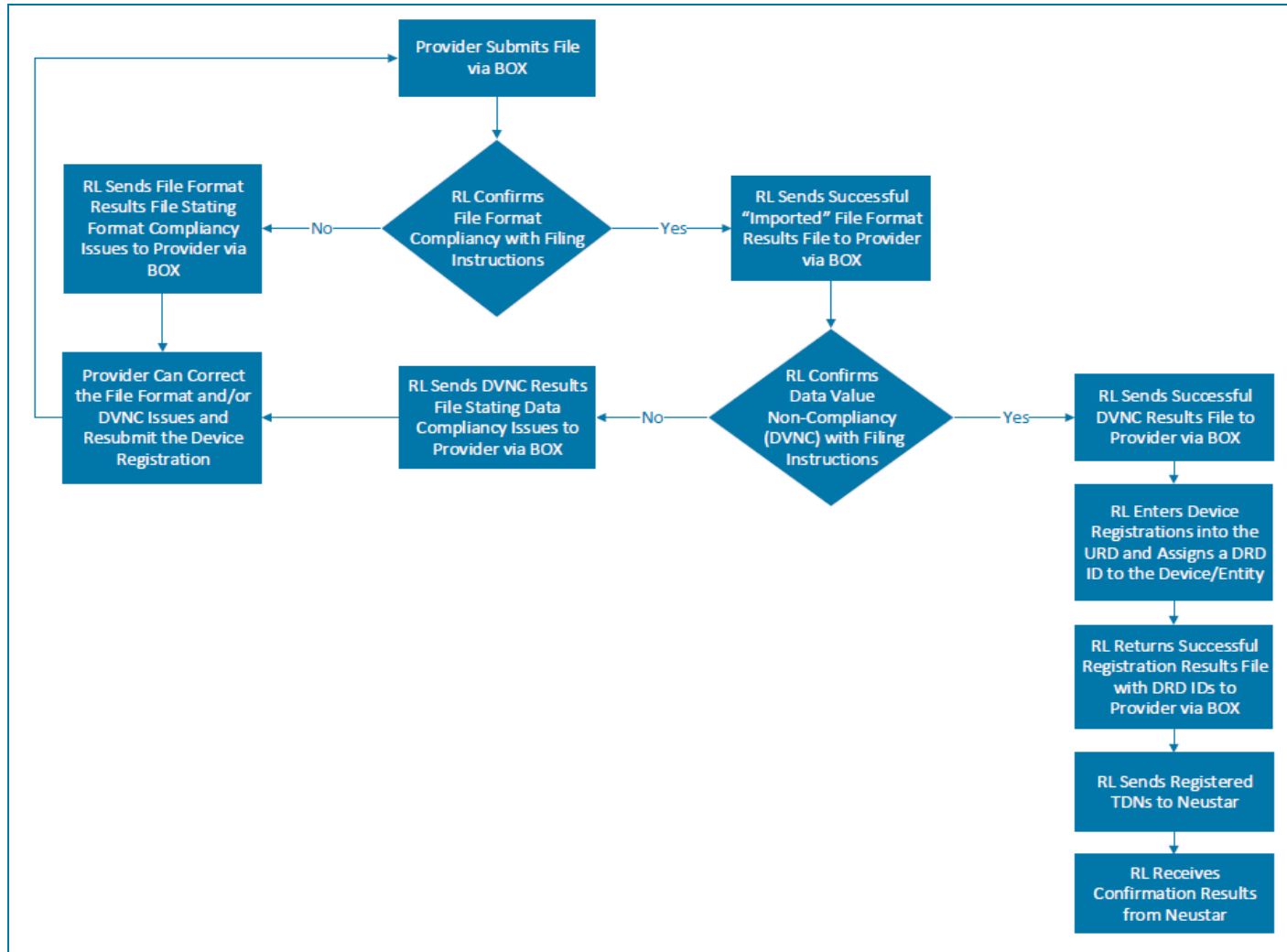
- Identity Validation Failure Reasons - Risk Codes
 - SSN
 - TDN
 - Address
 - Name
 - DOB match level
 - Combinations of the above

- 26 risk codes currently prevent systematic successful URD registration

Processing Summary - Users

- Remediation steps of these codes are outlined within the URD filing instructions including what documentation may be acquired by the users or the providers themselves to decrease identity validation risk associated to the returned codes.
- Documentation indicators aligning with documentation types can then be submitted by the providers for remediation of the risks and acceptance into the URD as a subsequent submission.
- All supporting documentation to remediate risks are acquired and maintained by the providers and subject to audit.
- If needed, providers have been instructed on how to submit an appeal to RL for manual review and consideration for entrance into the URD.

Processing Summary – Devices



Processing Summary - Devices

- Data sent from Providers to RL include:
 - RegistrationRequestID – created/prepared by the provider
 - Entity Name
 - Entity Address
 - Entity Point of Contact TDN
 - TRS TDN
 - Phone Type (Private, Public or Internal)
 - Registered Address
 - Service Initiation Date
 - Date of Last Activity
 - Consent Date
 - Hearing User Indicator Field
 - If applicable – Self-Certification Date (Private phone type only)
 - If applicable – Self-Certification PDF Document (Private phone type only)
 - If applicable – Ported Consent Date
 - If applicable – Ported Confirmation Number
 - ** Name of the responsible person for the videophone
 - ** Tax Identification Number of the enterprise (for non-governmental enterprises)

** - New fields proposed in FNPR (FCC 17-26)

Processing Summary – Successful Processing

- Upon successful processing of user or device registrations, RL issues a **unique identifier**:
 - For USER registrations, it is referred to a URDID:
 - A URDID is issued per identity of a user within the URD database.
 - In the event that an identity can not be tied to an existing identity within the database a new URDID is issued to that registration.
 - A URDID can be the same across providers if the identity associated with that ID has numerous TDNs across default providers.
 - For DEVICE registrations, it is referred to a DRDID:
 - DRDID is associated to the combination of entity name, POC TDN and address submitted within the registration. In the event an entity name, POC TDN and address are the same within the submitted fields, the same DRDID will be issued for multiple registrations of those same field assignments.
 - DRDID can be the same across providers if the entity name, POC TDN and address submitted are the same across providers.

Processing Summary – Updating User/Device Information

- RL has created file formats and instructions for submission of :
 - user information updates
 - device/entity information updates

- Providers can update any or all of the following:
 - For users:
 - name, residential address, registering address, for users that are guardians of more than one TRS user, the minor's DOB
 - For devices:
 - entity name, entity address, registering address, entity contact TDN

- Update files are tested for file format and data value compliance. Status files are generated to notify the provider of accepted and/or rejected update files and records.

Processing Summary – Terminating User/Device Registrations

- RL has created file formats and instructions for submission of :
 - user registration terminations
 - device/entity registration terminations

- Providers must notify RL if a registered user/entity:
 - no longer wants use of a TDN for TRS service
 - is determined not eligible to use the service

- Termination files are tested for file format and data value compliance. Status files are generated to notify the provider of accepted and/or rejected termination files and records.

Processing Summary – Database Querying

- VRS providers can use the URD web application to:
 - Search their own registration data to ensure that the URD information is correct and complete
 - User - searches can be done by First Name, Last Name, Address, TRS TDN, and/or URDID
 - Device/Entity - searches can be done by Entity Name, Entity Address, Entity Contact TDN, TRS TDN and/or DRDID
 - Search for a single TDN to verify registration status within the URD with a yes/no response

Processing Summary – Considerations

○ *Minors*

RL has created a process for acquiring and storing identity information for a guardian submitted on behalf of the minor. The information pertaining to the minor that is required for registration is:

- DOB
- TDN
- registering address

○ Maturing registration of a minor

- 60 days prior to the 18th birthday of the minor, the default service provider(s) will be notified that a new registration request for the minor must be submitted
- A new registration must be submitted no later than 60 days after the minor's 18th birthday
- If no registration request is submitted, the TDN for the minor will be terminated

Proposed Processing Schedules

- RL anticipates processing user/device registration, update, termination and appeal files twice daily 10am EST and 2pm EST during the 60 day window when providers are to submit all existing user and device TDNs for registration.
- After the 60 day window for existing users and device submissions has closed and the FCC has instructed Neustar to initiate the All Call Query (ACQ), RL is prepared to process every hour on the hour (24/7).

Next Steps...

- Enterprise phone additional data elements to be added to current test processing cycles:
 - Name of responsible person for the video phone
 - Currently only acquiring the TDN of this individual, not the name
 - Tax identification number of the enterprise (for non-governmental enterprises)
 - This ID is commonly the SSNs of small business owners. Is it the intention of the FCC to keep maintain these full TINs in the URD DB? Would it be possible to acquire/review these TINs as needed on a per audit basis of these device registrations?