

October 4, 2018

VIA ECFS

Ms. Marlene Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

Re: Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities, CG Docket No. 03-123; CG Docket No. 10-51

Dear Ms. Dortch:

The Interstate Telecommunications Relay Service Fund Advisory Council (Council) advises Rolka Loube Associate (RLA), which among other things, administers the Telecommunications Relay Service – User Registration Database (TRS-URD). This letter provides the Council’s support of the Commission’s expeditious review of the video relay service (VRS) providers’ petition for a limited waiver expressly permitting them to provide service to a new user or one ported from another provider while that user’s verification through the TRS-URD is pending.¹

Since May 1, 2018, any individual registering for an account with a provider must first be verified by TRS-URD prior to being permitted to make or receive VRS calls.² As the Commission is aware, most verifications—generally over 70%—occur within hours of submission of the user’s information to TRS-URD, which means that “failure rates for th[e] initial, automated verification step” may “exceed[] 20 percent.”³ During the Council meeting earlier this month, RLA confirmed that the verification rate has basically remained the same, largely due to missing or erroneous personal information when attempting verification through TRS-URD which requires remediation, often by collecting additional information from the registering individual. Thus, a significant number of VRS users are routinely unable to access telecommunications for an appreciable amount of time while their verification is pending.

The Joint Provider Petition seeks a limited waiver authorizing service to new or porting users for a period of up to two weeks while verification is pending, but would only seek compensation for VRS calls during that period once validation is, in fact, obtained.⁴ The Council acknowledges the Consumer Groups’ view that the grant of the requested waiver

¹ *Telecommunications Relay Services and Speech-to-Speech Services of Individuals with Hearing and Speech Disabilities; Structure and Practices of the Video Relay Services Program*, Joint Petition of VRS Providers for a Waiver, CG Docket Nos. 03-123 and 10-51 (June 20, 2018) (Joint Provider Petition).

² See, *Structure and Practices of the Video Relay Service Program; Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities*, Order, DA 18-324, OMD CGB CG Docket Nos. 10-51, 03-123, (Mar. 30, 2018).

³ *Structure and Practices of the Video Relay Service Program; Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities*, Order, DA 18-196, OMD CGB CG Docket Nos. 10-51, 03-123, ¶ 7 (Feb. 28, 2018).

⁴ Joint Provider Petition, pp. 1-2.

would “enable individuals who are deaf, hard of hearing, speech impaired, deaf-blind and deaf with mobility issues to access VRS services in a timely...and practical manner while still satisfying the Commission’s obligation to prevent waste, fraud, and abuse of TRS services.”⁵

RLA has informed the Council that there would not be a significant cost to the TRS Fund if the requested waiver was granted. In addition, RLA said that while some substantial work would be involved in supporting the tracking and compensation of VRS calls made by individuals that are in a pending verification status, such work is feasible. However, the Commission should provide RLA ninety (90) days to develop its capacity in support.

Given the Council’s role in advising RLA in carrying out its responsibilities in accordance with TRS rules and requirements, we wish to urge the Commission to rapidly act on the requested waiver so that eligible individuals are not unnecessarily delayed in accessing telecommunications through VRS.

Sincerely,

/s/

Ron Bibler, Chair
TRS Advisory Council

⁵ *Telecommunications Relay Services and Speech-to-Speech Services of Individuals with Hearing and Speech Disabilities; Structure and Practices of the Video Relay Services Program*, Comments of Consumer Groups in Response to the Joint Petition of VRS Providers for Waiver, CG Docket Nos. 03-123 and 10-5, p.2 (July 26, 2018).