

Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

In the Matter(s) of	:	
	:	
Misuse of Internet Protocol (IP)	:	CG Docket No. 13-24
Captioned Telephone Service	:	
	:	
Telecommunications Relay Services	:	CG Docket No. 03-123
And Speech-to-Speech Services	:	
For Individuals with Hearing	:	
And Speech Disabilities	:	October 16, 2018

REPLY COMMENTS OF THE CONNECTICUT  
PUBLIC UTILITIES REGULATORY COMMISSION ON  
JUNE 18, 2018 FURTHER NOTICE OF PROPOSED RULEMAKING

Pursuant to § 1.405 of the Federal Communications Commission’s Rules (“FCC” or “Commission”), the Connecticut Public Utilities Regulatory Authority (“CT-PURA”) respectfully submits these reply comments to the Commission’s *Further Notice of Proposed Rulemaking* released on June 8, 2018. CT-PURA submits these reply comments in general support of comments submitted by the National Association of Regulatory Utility Commissioners, the California Public Service Commission, the Colorado Public Service Commission, the Kansas Corporation Commission, the Nebraska Public Service Commission, the Pennsylvania Public Utility Commission and the Public Service Commission of Utah. CT-PURA echoes these comments and takes the opportunity to inform the Commission as to how its laws might interact with the Commission’s proposed rules.

In the Further Notice of Proposed Rulemaking, the Commission seeks to update the record regarding states’ concerns as to whether additional state legislative authority may be required to administer Internet Protocol Captioned Telephone Service (“IP-CTS”). *FNPRM* at

¶112. The Nebraska Public Service Commission indicates that its statutory authority will require amendment to administer IP-CTS, and suggests a five year transition period before state administration would be mandatory. Nebraska PUC Comments, pp. 2-4. CT-PURA supports the Nebraska PUC comments, and provides the following to assist in updating the Commission's record on the matter.

Connecticut state law authorizes CT-PURA to:

...establish ... telecommunications relay service programs funded by all carriers that provide intrastate telecommunications services, as such terms are defined in 47 USC 153, as amended from time to time, sufficient to provide low-income households or individuals or speech and hearing impaired individuals with a level of telecommunications service or package or telecommunications services that supports participation in the economy and society of the state....

Conn. Gen. Stat. § 16-247e(a)(2).

CT-PURA has not issued a ruling interpreting whether the above language authorizes it to administer IP-CTS, and is thus hesitant to provide a definitive interpretation in these reply comments. However, the five-year transition period alluded to in the Nebraska PUC comments would allow this and other state regulators to audit their legislative authority, determine whether additional statutory authority is needed, take steps necessary to gain additional authority, and if necessary, seek additional resources to perform necessary tasks. Consequently, CT-PURA supports this specific recommendation, and generally supports other comments submitted by state public utility commissions.

PUBLIC UTILITIES  
REGULATORY AUTHORITY

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