

February 7, 2019

via ECFS and e-mail

Marlene H. Dortch
Secretary, Office of the Secretary
Federal Communications Commission
445 12th Street, SW, Room TW-A325
Washington, DC 20554

**Re: Telecommunications Relay Services and Speech-to-Speech Services for
Individuals with Hearing and Speech Disabilities • CG Docket No. 03-123
Misuse of Internet Protocol (IP) Captioned Telephone Service • CG Docket
No. 13-24**

Dear Ms. Dortch,

On February 7, 2019 I spoke with Eliot Greenwald of the Consumer and Governmental Affairs Bureau to discuss the issue of Internet Protocol Captioned Telephone Service (IP CTS) user verification, which is the topic of a multipart item in the above-referenced dockets scheduled for a vote at the Commission's February open meeting.¹ I explained that the Hearing Loss Association of America (HLAA) and Telecommunications for the Deaf and Hard of Hearing, Inc. (TDI) support the Commission allowing IP CTS providers to continue service to new IP CTS users while registration verification and appeals thereof are pending so long as the providers absorb the cost of service incurred during the verification period if a user's registration is not verified.² A delay of days or weeks in service while verification and appeals thereof are pending would hinder legitimate use by those who are awaiting identity verification and require IP CTS to communicate. Once user verification is complete, providers should be compensated for the minutes used.

Alternatively, we support the Commission moving this issue to the FNPRM portion of the item for the development of a more detailed record on the mechanics of user registration and verification.

Please don't hesitate to contact me if you have any questions.

¹ Draft Report and Order, Further Notice of Proposed Rulemaking, and Order, CG Docket Nos. 03-123 and 13-24 (Jan. 29, 2019) <https://docs.fcc.gov/public/attachments/DOC-355847A1.pdf>.

² *Contra id.* at ¶ 16.

Respectfully submitted,

/s/

Blake E. Reid³

Counsel to TDI

Samuelson-Glushko Technology Law &
Policy Clinic (TLPC)

blake.reid@colorado.edu

CC:

Michael Carowitz, Office of Chairman Pai

Arielle Roth, Office of Commissioner O’Rielly

Jamie Susskind, Office of Commissioner Carr

Travis Litman, Office of Commissioner Rosenworcel

Randy Clarke and Michael Scurato, Office of Commissioner Starks

Patrick Webre, Consumer and Governmental Affairs Bureau

Robert Aldrich, Consumer and Governmental Affairs Bureau

Eliot Greenwald, Consumer and Governmental Affairs Bureau

Michael Scott, Consumer and Governmental Affairs Bureau

³ Corian Zacher, student attorney, assisted in the drafting of this filing.