

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

In the Matter of)	
)	
Telecommunications Relay Services and)	CG Docket No. 03-123
Speech-to-Speech Services for Individuals)	
with Hearing and Speech Disabilities)	
)	
Truth-in-Billing and Billing Format)	CG Docket No. 98-170

COMMENTS OF CONSUMER GROUPS

Telecommunications for the Deaf and Hard of Hearing, Inc. (TDI), Association of Late-Deafened Adults (ALDA), California Coalition of Agencies Serving the Deaf and Hard of Hearing, Inc. (CCASDHH), Cerebral Palsy and Deaf Organization (CPADO), and Hearing Loss Association of America (HLAA) (collectively, “Consumer Groups”)¹ respectfully submit these reply comments in response to comments filed with the Federal Communications Commission’s (“FCC” or “Commission”) concerning the petition filed by ITTA – The Voice of America’s Broadband Providers seeking a declaratory ruling that carriers can list Telecommunications Relay Services (TRS) along with other regulatory fees in a line item on customer bills. Consumer Groups write to express their current thinking on this matter, given that other commenters have highlighted their stake in this proceeding.²

As described in the comment filed by Kairos Partners, some of the undersigned organizations—and other organizations representing individuals with disabilities—have

¹ Consumer Groups seek to promote equal access to telecommunications for the 48 million Americans who are deaf, hard of hearing, late-deafened, or deafblind, as well as those with other disabilities, so that they may fully experience the informational, educational, cultural, and societal opportunities afforded by the telecommunications revolution.

² Comments of Kairos Partners at 14.

historically opposed allowing carriers to list TRS fees on customer bills in any manner.³ At the time the Commission was developing the TRS program, accessibility groups argued, in general, that TRS is an equal access service that, like other equal access services, should not be singled out as an extra cost. These groups were concerned that singling out TRS fees would result in further discrimination against individuals with disabilities and customer complaints that could only serve to undermine the TRS program.

Consumer Groups still feel strongly that TRS is an equal access service and that this service benefits everyone. Indeed, TRS gives individuals *without* disabilities the ability to communicate with individuals that have disabilities just as much as it facilitates communications for individuals with disabilities. Consumer Groups also remain concerned that singling out TRS fees will result in discrimination. However, Consumer Groups support transparency and recognize that the Commission has promoted transparency in customer billing.

Thus, on the specific question of whether carriers may list TRS on customer bills grouped together in a line item with other regulatory fees, Consumer Groups take no affirmative position. Consumer Groups also decline to assert any arguments as to whether the Commission is required to open a rulemaking proceeding to decide this matter or whether the Commission or Consumer and Governmental Affairs Bureau on delegated authority may decide this matter using a declaratory ruling.

Regardless of the Commission's ultimate decision, Consumer Groups hope that the Commission, carriers, and other stakeholders will join accessibility organizations in making clear to the public that TRS is not just a regulatory fee, but a service that is beneficial to the general public because it allows all individuals to communicate with each other.

³ *Id.* at 11-14.

Respectfully submitted,

/s/ Chris Laughlin

Chris Laughlin

Institute for Public Representation

Georgetown University Law Center

600 New Jersey Avenue NW, Room 312

Washington, DC 20001

(202) 662-9543

Counsel for TDI

Telecommunications for the Deaf and Hard of Hearing, Inc. (TDI)

Claude Stout, Executive Director • cstout@TDIforAccess.org

8630 Fenton Street, Suite 121, Silver Spring, MD 20910

TDIforAccess.org

Association of Late-Deafened Adults (ALDA)

Sharaine Roberts, President • aldapresident@alda.org

8038 MacIntosh Lane, Suite 2, Rockford, IL 61107

815.332.1515 • 866.402.2532 (toll-free)

www.alda.org

California Coalition of Agencies Serving the Deaf and Hard of Hearing, Inc. (CCASDHH)

Sheri A. Farinha, Vice Chair • sfarinha@norcalcenter.org

4708 Roseville Rd, Suite 111, North Highlands, CA 95660

Cerebral Palsy and Deaf Organization (CPADO)

Mark Hill, President • president@cpado.org

12025 SE Pine Street, #302, Portland, OR 97216

503.468.1219

www.cpado.org

Hearing Loss Association of America (HLAA)

Barbara Kelley, Executive Director • bkelly@hearingloss.org

Lise Hamlin, Director of Public Policy • lhamlin@hearingloss.org

7910 Woodmont Avenue, Suite 1200, Bethesda, MD 20814

hearingloss.org

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