

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

In the Matter of)	
)	
Structure and Practices of the Video Relay Service Program)	CG Docket No. 10-51
)	
Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities)	CG Docket No. 03-123
)	

COMMENTS

**Telecommunications for the Deaf and Hard of Hearing, Inc.
National Association of the Deaf
Association of Late-Deafened Adults, Inc.
Cerebral Palsy and Deaf Organization
American Association of the DeafBlind**

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Dated: August 5, 2019

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COMMENTS

Telecommunications for the Deaf and Hard of Hearing, Inc., National Association of the Deaf, Association of Late-Deafened Adults, Inc., Cerebral Palsy and Deaf Organization, and American Association of the DeafBlind (collectively “Consumer Groups”) submit these comments in response to the Federal Communication Commission’s (“Commission”) Further Notice of Proposed Rulemaking released on May 15, 2019.¹

A. Permitting At-Home Interpreting on a Permanent Basis

The Consumer Groups generally support transitioning the pilot VRS at-home call-handling program (the “Pilot Program”), but some concerns remain. Based on anecdotal information, users generally are not able to distinguish calls handled in a call center versus an at-home location. This speaks to the professionalism of interpreters working from home and the apparent compliance with the standards and safeguards of the Pilot Program. Although Commenters are not aware that the Pilot Program negatively impacted call reliability and

¹ *Structure and Practices of the Video Relay Service Program; Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities, Report and Order and Further Notice of Proposed Rulemaking, FCC 19-39 (May 15, 2019) (FNPRM).*

responses times, the Consumer Groups continue to urge VRS providers to further improve call reliability and response times to meet the goal of functional equivalency.

While the Consumer Groups are not aware of any breaches in confidentiality in VRS calls handled at-home, this significant concern remains because confidentiality in communications is a key aspect of functional equivalency and required by the TRS rules.² The Commission should continue to evaluate and improve the safeguards for confidentiality as technology changes and improves. Similarly, the Commission should evaluate the security safeguards employed by providers for the secure connection to the provider's network from at-home locations required by 47 C.F.R. § 64.604(b)(8)(v)(E).³

Also of concern to the Consumer Groups is the confidentiality related to real-time-text ("RTT") used during a VRS call. Confidentiality safeguards should be developed to prevent interpreters from copying information from RTT. This is of particular concern for consumers who rely on RTT during VRS calls, such as Deaf-Blind consumers, and who use RTT to provide credit/debit card or other financial or personal information to a business when making a purchase via a VRS call. Interpreters should be prevented from copying and pasting RTT text, particularly to avoid stealing financial and personal data from a consumer. The Consumer Groups are aware that technology exists to prevent copy and paste in software and urge VRS providers to implement technology that prohibits interpreters, whether in call centers or at home, from copying and pasting RTT text.

B. Providing Service to New and Porting Users Pending TRS-URD Verification

The Consumer Groups support the proposal to allow VRS providers to provide service to new and porting users pending the completion of identity verification. VRS users should not be

² See 47 C.F.R. § 64.604(a)(2).

³ The Consumer Groups are similarly concerned with the security of VRS calls generally.

without service, particularly the ability to make emergency calls while awaiting identity verification. In most instances, applications for a communications service by a hearing individual can be completed and approved nearly instantaneously and service activated within hours. Preventing individuals who are deaf, deaf-blind or have speech or additional disabilities from utilizing VRS while their identity is pending perhaps for weeks would thwart the goal of functional equivalency. While the Consumer Groups believe that a two week temporary registration is sufficient for most potential applicants, two weeks may not be sufficient for others such as deaf-blind or deaf with additional disabilities that may require assistance in completing or providing further information to validate their application. Therefore, the Consumer Groups recommend that the Commission permit VRS providers to extend the initial two-week temporary registration period for consumers who certify as part of the application process that they are deaf-blind or deaf with additional disabilities. While a single two-week extension period may be sufficient in most cases, VRS providers should have the ability to grant additional extensions.

Regardless, a new or ported telephone number should not be removed from the Numbering Directory until after the identity verification process has been completed with a final determination that the user's identity cannot be verified even if such verification process takes longer than the two-week period and any applicable extensions. This will help avoid existing users from losing their ported number or being assigned another number once their identity is verified after the two-week period and any applicable extensions. The Consumer Groups expect that the incidents of a number being retained for longer than a two-week period while a consumer's identity is being verified will be minimal and will not deplete numbering resources.

C. Requiring Enterprise and Public Videophone Log-In Procedures

1. General Considerations

As explained in prior filings with the Commission,⁴ the Consumer Groups oppose any log-in requirements to use enterprise and public videophones as well as the proposed certification requirement for the responsible individual. The Consumer Groups reiterate, and incorporate into these Comments, the concerns expressed in Consumer Groups February 20, 2018 Ex Parte and in the Consumer Groups May 2, 2019 Ex Parte, attaching those letters to these Comments as Appendices A and B. With respect to users of public or enterprise videophones who may not be URD-eligible because they do not have access to broadband,⁵ the Consumer Groups add that users in rural areas also may have this impediment and that any log-in requirement should facilitate a work-around for any URD-ineligible user. The Consumer Groups also continue to recommend that the Commission refer the issue to the iTRS Advisory Council to work with the TRS Fund Administrator on less burdensome ways to validate VRS calls from public and enterprise telephones.⁶

To the extent that the Commission continues to believe safeguards in addition to the certification safeguards for enterprise videophones are needed, the safeguards should impose as little burden on the consumer as possible so as not to undermine functional equivalency or

⁴ See Letter from Danielle Burt and Tamar Finn, Counsels for Telecommunications for the Deaf and Hard of Hearing, Inc., to Marlene H. Dortch, Secretary, FCC, CG Docket Nos. 10-51 and 03-123 (filed Feb. 20, 2018) (Consumer Groups February 20, 2018 Ex Parte); Letter from Danielle Burt and Tamar Finn, Counsels for Telecommunications for the Deaf and Hard of Hearing, Inc., to Marlene H. Dortch, Secretary, FCC, CG Docket Nos. 10-51 and 03-123 (filed May 2, 2019) (Consumer Groups May 2, 2019 Ex Parte); *see also*, Letter from John T. Nakahata, Counsel to Sorenson, to Marlene H. Dortch, FCC, Secretary, CC Docket Nos. 10-51 and 03-123, at 2-3 (filed Jan. 26, 2018) (Sorenson January 26, 2018 Ex Parte); Letter from Gregory Hlibok, Chief Legal Officer, ZVRS Holding Company, to Marlene H. Dortch, FCC, Secretary, CC Docket Nos. 10-51 and 03-123 (filed Feb. 7, 2018) (confidential) (ZVRS February 7, 2018 Ex Parte).

⁵ Consumer Groups February 20, 2018 Ex Parte at 2.

⁶ Consumer Groups February 20, 2018 Ex Parte at 1, 2.

infringe on consumers' privacy rights.⁷ Sorenson's suggestion of entering the user's VRS telephone number (without a PIN) is a reasonable alternative for many but not all VRS users because many VRS users who have a VRS telephone number likely will remember their VRS telephone number and thus entering it will not be an undue burden for those users. However, there are some VRS users whose cognitive abilities may not be sufficient to enter their VRS telephone number on demand, much less a PIN. Further, as stated above with respect to a log-in requirement generally, there are VRS users who do not have a VRS telephone number who would not be able to use public or enterprise videophones even under Sorenson's proposal. Therefore, Sorenson's recommendation is not without burden and will not ensure functional equivalency for all consumers.

2. Proposed Exemptions.

To be clear, the Consumer Groups oppose any log-in requirements to use enterprise and public videophones. If the Commission nevertheless wishes to adopt a log-in requirement, the Consumer Groups urge the FCC to reduce the burden of any such requirement to the greatest possible extent and make the log-in requirement as narrow as possible. The Consumer Groups support unqualified exemptions for point-to-point and emergency calls. Similarly, the Consumer Groups support exemptions for limited user enterprise videophones and for videophones in emergency shelters and domestic abuse shelters.

Because there are important issues that need to be addressed for exemptions to any log-in requirement, the Consumer Groups would prefer that the FCC not adopt a log-in requirement in the first instance. With respect to limited user enterprise videophones, the Consumer Groups are concerned with the limitation of allowing only five registered users to be simultaneously logged-in. This could unintentionally decrease the employer's interest/resources to hire more deaf and

⁷ *See id.*

hard of hearing individuals to work for the company. In addition, certain enterprises may have more than five employees or regular customers that are deaf or hard-of-hearing. In such a situation, who would decide what five persons could be logged in? How would that decision be made? How would a decision to log-out one of the five users and replace them with another user be made? Similarly, the Commission should provide guidance on the contents of a profile and how that profile is created.

To the extent there is a log-in requirement, the Consumer Groups support expanding the locations that qualify for an emergency exemption. In addition to emergency shelters and domestic abuse shelters, sexual abuse shelters and any other shelter that offers emergency or transitional assistance to a type of user should qualify for an emergency-type exemption to the log-in requirement.

Respectfully submitted,

/s/ Brett P. Ferenchak

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APPENDIX A

Consumer Groups February 20, 2018 Ex Parte

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VIA ECFS

February 20, 2018

Marlene H. Dortch, Secretary
Federal Communications Commission
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Re: EX PARTE FILING

CG Docket No. 03-123 - In the Matter of Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities; CG Docket No. 10-51 – Structure and Practices of the Video Relay Service Program

Dear Ms. Dortch:

Telecommunications for Deaf and Hard of Hearing, Inc., National Association of the Deaf and the Rehabilitation Engineering Research Center on Technology for the Deaf and Hard of Hearing at Gallaudet University (the “Consumer Groups”) submit this letter regarding the proposal to require VRS providers to establish log-in procedures for VRS users in connection with the use of public videophones and enterprise videophones not located in private workspaces.¹

The Consumer Groups urge the Commission to refrain from imposing, at this time, a log-in requirement for public videophones. Rather, the Commission should refer the matter to the iTRS Advisory Council to work with the TRS Fund Administrator on potential means to validate VRS calls from public videophones. While the FCC should take reasonable steps to prevent fraud or abuse, as explained below, the proposed log-in requirement for public videophones will be burdensome to consumers and the benefits do not outweigh those burdens.

A log-in requirement for public videophones that obliges users to input information (e.g., both the user’s iTRS number and a personal identification number) to authenticate calls would be burdensome for multiple reasons. VRS users may have to provide sensitive information to a VRS provider to establish a PIN or passcode in addition to personal information that VRS users must provide to VRS providers for the User Registration Database (URD). Consumers have

¹ See *Structure and Practices of the Video Relay Service et al.*, Report and Order, Notice of Inquiry, Further Notice of Proposed Rulemaking, and Order, 32 FCC Rcd 2436 at ¶ 119 (2017).

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previously expressed concerns about providing personal information² and providing additional log-in information raises concerns about VRS providers keeping the applicable authentication mechanisms secure. The FCC should give the URD launch some time before implementing any additional requirement for users to provide information to make VRS calls.

Users would need to retain applicable log-in information to be used for those occasions – which may be few and far between for many users – when they need to make a call from a public videophone. Retaining applicable log-in information could be challenging for any VRS user and especially for VRS users with cognitive disabilities (even if log-in information is written on a piece of paper and carried with a user).

Some users who use public videophones may not be URD-eligible (e.g., homeless, consumers that cannot afford home broadband service, minors, immigrants). The proposed log-in should facilitate a work-around for any URD-ineligible user.

Furthermore, traffic from public videophones comprises an extremely small portion of all VRS calls.³ As a result, the potential for fraud or abuse of public videophone usage should be proportionately small if not *de minimis*. Given this, the need for a log-in requirement for public videophones at this time does not outweigh burden to consumers.

Accordingly, the Consumer Groups ask the FCC to refrain, at this time, from imposing a log-in requirement for public videophones. They also ask the FCC to refer the matter to the iTRS Advisory Council to work with the TRS Fund Administrator on potential options to validate VRS calls from public phones that will not be so burdensome to consumers.

Please feel free to contact the undersigned if you have any questions.

Respectfully submitted,

/s/ Danielle Burt

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² See e.g., Consumer Groups' Joint Petition, CG Docket Nos. 10-51 and 03-123, dated October 1, 2015.

³ See e.g., Sorenson Communications, LLC Letter, CG Docket Nos. 10-51 and 03-123, dated January 26, 2018 (reporting 0.8%).

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APPENDIX B

Consumer Groups May 2, 2019 Ex Parte

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VIA ECFS

May 2, 2019

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Re: EX PARTE FILING

CG Docket No. 10-51 – Structure and Practices of the Video Relay Service Program; CG Docket No. 03-123 - Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities

Dear Ms. Dortch:

Telecommunications for Deaf and Hard of Hearing, Inc., National Association of the Deaf, Cerebral Palsy and Deaf Organization, Association of Late-Deafened Adults, American Association of the Deaf-Blind and Hearing Loss Association of America (the “Consumer Groups”) and Gallaudet University (“Gallaudet”) submit this letter to address the enterprise videophone registration portion of the *Draft Report and Order and Further Notice of Proposed Rulemaking* (“*Draft R&O*”).¹

The Consumer Groups previously asked the Commission not to adopt rules that would restrict certain deaf and hard of hearing and speech-disabled individuals from being able to use videophones in public spaces.² In the *Draft R&O*, the Commission proposes to require VRS providers to obtain, from the individual responsible for ensuring compliant use of an enterprise videophone, a certification that the responsible individual “will make reasonable efforts to ensure that *only registered VRS users* are permitted to use the phone for VRS calls.”³ The Consumer Groups and Gallaudet object to this proposal. That certification is likely to result in restricted access to enterprise videophones by deaf and hard of hearing and speech-disabled individuals that may not be



¹ 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*, Report and Order and Further Notice of Proposed Rulemaking, CG Docket Nos. 10-51 & 03-123, FCC-CIRC1905-07 (circulated April 18, 2019) (“*Draft R&O*”).

² See *Ex Parte* Letter from the Consumer Groups and RERC to Marlene H. Dortch, Secretary, CG Docket Nos. 10-51 and 03-123, dated February 20, 2018 (“*Consumer Groups Ex Parte Letter*”).

³ *Draft R&O* at ¶ 27 (*emphasis added*).

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registered in the TRS User Registration Database (“TRS-URD”), including spouses or partners, children, and roommates of registered users; students; homeless individuals; and minors.⁴

The Consumer Groups and Gallaudet support the alternative proposal that the responsible individual “will make reasonable efforts to ensure that *only persons with a hearing or speech disability* are permitted to use the phone for VRS calls.”⁵ The modified proposal will ensure that deaf and hard of hearing and speech-disabled individuals, regardless of whether they are individually registered in the TRS-URD, will have the same ability to access enterprise videophones as those who are individually registered.

The Consumer Groups and Gallaudet also are concerned about what may constitute “reasonable efforts” and ask the Commission to ensure that any examples of “reasonable efforts” do not undermine functional equivalency or infringe on consumers’ privacy rights. The example given is “reasonable efforts *could* include maintaining a list of users, requiring such individuals to provide proof of registration when requesting to use a videophone, and maintaining a copy of the user’s request.”⁶ This suggested “reasonable efforts” approach is inconsistent with the requirement of functional equivalency.⁷ Hearing individuals are not required to identify themselves, provide proof of their need to make a telephone call, or be recorded in a log of users of an enterprise phone available for non-employee use. Organizations providing enterprise videophones should not maintain a list of deaf and hard of hearing and speech-disabled users, require proof of registration, or maintain a copy of the user’s request either. Nor should organizations be required to monitor an enterprise videophone to ensure that only deaf and hard of hearing and speech-disabled individuals place VRS calls. The Commission’s rules should encourage enterprises to make videophones available to their employees and non-employee customers or guests. The Consumer Groups and Gallaudet fear that the restrictive registration requirements proposed in the *Draft R&O* would discourage enterprises from doing so, with the adverse effect of restricting access to communications by deaf and hard of hearing and speech-disabled consumers.

The “reasonable efforts” requirements as drafted also could compromise consumer privacy protections provided by laws like the Health Insurance Portability and Accountability Act of 1996 (HIPAA) and the Children’s Online Privacy Protection Act (COPPA). The Consumer Groups have expressed repeated concerns about providing personal information and about keeping applicable authentication mechanisms secure.⁸ Although the Commission has adopted measures to protect consumers’ privacy for information collected by VRS providers and the TRS-URD, it does not have

⁴ See *Ex Parte* Letter from John T. Nakahata and Julie A. Veach, Counsel to Sorenson Communications, LLC, to Marlene H. Dortch, Secretary, CG Docket Nos. 10-51 and 03-123, dated April 30, 2019 (noting the TRS Administrator Database Instructions permit a single user to register a “family/shared/joint” account for use by all family members and the TRS Administrator does not maintain the names of minors) (“*Sorenson Ex Parte Letter*”).

⁵ *Id.* at Appendix A (*emphasis added*).

⁶ *Draft R&O* at ¶ 27, fn. 93 (*emphasis added*).

⁷ See Consumer Groups’ TRS Policy Statement – Functional Equivalency of Telecommunications Relay Services: Meeting the Mandate of the Americans with Disabilities Act (Apr. 12, 2011) (“TRS Policy Statement”), <https://ecfsapi.fcc.gov/file/7021748016.pdf>. One of the core functional equivalency principles is the “TRS experience for an individual who is deaf, hard of hearing, deaf-blind or speech-disabled must, at the minimum, be equivalent to that of a call between two hearing persons on the telephone network or over the Internet.”

⁸ See *Consumer Groups Ex Parte Letter*.

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jurisdiction to mandate the enterprises provide equivalent protections for sensitive consumer information. The Commission should not require enterprises to collect such sensitive information if it cannot also protect that information.

Given these functional equivalency and privacy concerns, the Consumer Groups and Gallaudet urge the Commission to seek additional comments on what may constitute "reasonable efforts." Taking more time on this topic, particularly when the Commission plans to seek further comment on individual log-in requirements, should help protect consumers' privacy rights and ensure that organizations are not discouraged from making enterprise videophones available.⁹

Please feel free to contact the undersigned if you have any questions.

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⁹ See *Sorenson Ex Parte Letter* (stating the proposed requirement discourages "entities from making this critical accommodation available – which discourages compliance with the ADA's reasonable accommodation requirements).

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