



September 14, 2018

Via Electronic Filing

Marlene H. Dortch, Secretary
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, D.C. 20554

CG Docket Nos. 13-24 and 03-123

Further NPRM – Misuse of Internet Protocol Captioned Telephone Service (IP CTS)

Dear Ms. Dortch:

The Telecommunications Equipment Distribution Program Association (TEDPA) submits these comments in response to the Report and Order, Declaratory Ruling, Further Notice of Proposed Rulemaking, and Notice of Inquiry released on June 10, 2018. In this document, the Federal Communications Commission (FCC) seeks comment on issues related to the FCC's Measures to Ensure the Sustainability of Internet Protocol Captioned Telephone Service (IP CTS). Specifically, the FCC is looking for comments on the need for third-party assessment of eligible users, requirements for IP CTS marketing and outreach methods or practices, IP CTS quality assurance measurements, and program efficiency.

TEDPA agrees with the FCC implementing rules which seek to control and measure the rapid growth of IP CTS minutes to safeguard the integrity of the TRS programs. IP CTS provides deaf, hard of hearing and DeafBlind individuals an excellent opportunity to participate in telecommunication services using advanced technologies and the FCC should ensure this service is sustainable for current and future generations.

In response to the Notice of Proposed Rulemaking (NPRM) released on June 10, 2018, please find TEDPA's comments attached.

Sincerely,

Sandra McNally, Chair
Nathan Gomme, Vice Chair
Kelly Robison, Secretary
Andy Leffler, Treasurer

CC: TEDPA Members
Karen Strauss-Peltz, Deputy Chief, FCC Consumer and Governmental Affairs Bureau
Eliot Greenwald, Deputy Chief, FCC Disability Rights Office
Michael Scott, Attorney Advisor, FCC Disability Rights Office

Sandra McNally, Chair Nathan Gomme, Vice Chair Kelly Robison, Secretary Andy Leffler, Treasurer



During the 2018 Telecommunications Equipment Distribution Program Association (TEDPA) business meeting held on September 8, 2018, the TEDPA members resolved to submit the following as comments to the Federal Communication Commission's June 8, 2018 Report and Order, Declaratory Ruling, Further Notice of Proposed Rulemaking (NPRM) addressing the sustainability of Internet Protocol Captioned Telephone Service (IP CTS) for current and future generations.

- TEDPA commends the Federal Communications Commission (FCC) for seeking comments in its June 8, 2018 Report and Order, Declaratory Ruling, Further NPRM on ways to ensure that IP CTS remains sustainable for states' deaf, hard of hearing, and DeafBlind consumers who rely on IP CTS to communicate effectively on the telephone.
- TEDPA commends the FCC for recognizing and adopting certain regulations for IP CTS providers whose practices promote the overuse of IP CTS when there are alternative technologies, such as amplified telephones, that are sufficient and cost effective.
- TEDPA supports the FCC in restructuring the IP CTS Provider compensation rate methodology to align with a cost-based rate for IP CTS providers to remain viable for eligible consumers.
- TEDPA recommends that the FCC consult and collaborate with TEDPA members on a continuing basis in the development and refinement of IP CTS, as TEDPA members have direct experience in the administration of their respective state's equipment distribution program. TEDPA recommends that the FCC establish avenues for frequent communications with TEDPA members such as conference calls, meetings, interactive webinars, etc.
- TEDPA recommends that the FCC establish as an option, a pilot program in which state equipment distribution programs receive federal funding to collect data and formulate recommendations to the FCC regarding consumer eligibility assessments, provider practices, and performance measures that would be useful to the FCC in drafting and adopting effective IP CTS regulations.
- TEDPA recommends that the FCC continue to refine its regulations to further eliminate waste, fraud and abuse by adopting additional requirements, including but not limited to, consumer eligibility assessment that are sufficiently thorough and not biased towards the use of IP CTS technology and standards of service.
- TEDPA recommends that the FCC continue to refine its regulations to further eliminate waste, fraud and abuse by requiring IP CTS providers to deliver accurate and complete information to educate consumers about IP CTS and alternative technologies available to the consumer.