Survey Response

1. **What type of providers do you currently collect funds from?**
2. Arizona – Transaction Privilege tax. 1.1% tax levied on the gross income derived from providing exchange access services which connect landline phone to local telephone providers’ network.
3. California – DDTP is funded by an all-end-user surcharge on landline and wireless phone bills, i.e., the California Relay Service and Communications Device Fund (CRSCDF) surcharge. This all-end-user surcharge is billed and collected by telecommunications carriers, which in turn, remit the surcharge monies to a financial institution as directed by the Commission or its representatives.
4. Colorado – Landline, wireless, VoIP (set charge), and prepaid wireless (% fee)
5. Florida – Florida does not collect any funds for IP-CTS. We currently collect funds from ILEC, CLEC, and STS providers for traditional TRS and CTS only.
6. Indiana – Landline, VoIP, Wireless, Cable, Some Pre-Paid
7. Kansas – Local exchange carriers and wireless carriers.
8. Kentucky – We collect from all local exchange carriers and wireless providers under our jurisdiction and required to register with the Commission to provide service. This includes CLECs and MVNOs. It does not include nomadic VoIP Providers, non-nomadic VoIP providers are included.
9. Louisiana – RAB is not currently collecting funds
10. Minnesota – Wired, post-paid wireless and prepaid wireless
11. Nebraska – Connections – based collection from ILEC’s, CLEC’s and registered providers (i.e. Wireless and VoIP providers)
12. New Mexico – As of FY18 the surcharge is collected from ITS, wireless, prepaid wireless, and VoIP. This was due to the change as of SB411. The funding is collected by Tax and Rev and transferred to the NMCDHH TRS funds.
13. North Carolina – Local exchange carriers and wireless carriers.
14. Oklahoma – Landline providers based upon local exchange access arrangements (landlines). Neither wireless nor VoIP is included.
15. Oregon – Currently, landline and wireless; interconnected VoIP effective 1/1/2018
16. Pennsylvania – Local Exchange Carriers (LEC) collect and remit TRS surcharge funds from the end user of access line (NO ip)
17. Texas – The universal service fund is funded by statewide uniform charge payable by each telecommunications provider that has access to the customer base. VoIP providers are not required to pay but a few do pay into the fund.
18. Utah – The Public Service Commission of Utah collects funds from landline and wireless accounts.
19. Washington State – We collect from landline, wireless and VoIP subscribers through a communication sales tax.
20. Wyoming – Landline and wireless accounts. Our law is less clear regarding VoIP and prepaid wireless. We receive funds from some VoIP and prepaid wireless providers but not all.
21. **Should the responsibility for IP-CTS Intrastate payment be moved to the states, would you need to change the type of providers that pay into the fund?**
22. Arizona – Possibly, since the cost is still unknown we don’t know how much additional funds will be needed.
23. California – At this point, it not clear that operator of the federal program are able to separate the interstate and intrastate portions of any particular call. Indeed, in the FNPRM (Report and Order and Further Notice of Proposed Rulemaking in the Matter of Misuse of Internet Protocol (IP) Captioned Telephone Service, Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities, (Report and Order, FNPRM); CG Docket No. 13-24; CG Docket No. 03-123 (FCC 13-118), rel: August 26, 2013), the FCC asks if it would be possible to separate the inter- and intrastate portions of a call. Yes, the answer to this inquiry is critical to the states, if the Commission expects them to shoulder the financial burden of providing IP CTS. In this vein, the states also would need access to information about call volumes, the number of people using IP CTS, and usage forecasts. To date, this information has not been made available to the states, thus hindering their ability even to “guesstimate” the fiscal impact on their existing relay service programs. For example, the model California used for authorizing users of captioned telephone service is quite different from the one that the FCC is proposing in the FNPRM. If the Commission were to adopt the rules it has proposed, the result would a major shift in how the CPUC’s relay service program operates, with the likely commensurate financial effects.
24. Colorado – With the additional funding amount unknown we cannot say affirmatively the additional providers would not need to be added.
25. Florida – This would require a statutory change in Florida.
26. Indiana – Possibly. Currently, any common carrier with a certificate of territorial authority in our state needs to pay.
27. Kansas - Yes
28. Kentucky – No, it is not likely that we would pursue other providers outside our jurisdiction.
29. Louisiana – N/A – No providers currently paying into the fund.
30. Minnesota – Perhaps. Currently, we collect from all providers except for nomadic VoIP. However, some of the fixed/interconnected VoIP providers (including one of the largest providers in MN) are refusing to collect/remit. It may take a change in federal regulations requiring that VoIP providers pay into state funds (as they are required to pay into the federal TRS fund)
31. Nebraska – no
32. New Mexico – Yes, but in a phased approach. We still don’t know the impact of the RTT transition. No, with our statute change we would not.
33. North Carolina – Probably yes, we would need to confer with the NC Utilities Commission (NCUC) about adding funding collection from the IP providers to support the increased volume of calls. How would this work, is an issue we would need to discuss with the NCUC.
34. Oklahoma - Yes
35. Oregon – Yes, the responsibility for IP-CTS intrastate payment should be moved to the states. No, we would not need to change the type of providers that pay into the fund.
36. Pennsylvania – Yes, but as phase in approach over five or more years.
37. Texas – Yes, if the funding comes with it.
38. Utah – This decision would need to be directed to State Legislatures. Utah would need to start a process with the legislature to determine whether it would be provided by the state if the FCC ceases to fund intrastate IP-CTS.
39. Washington State - No
40. Wyoming – We would probably use a change (i.e. responsibility for IP-CTS) as an opportunity to clean up and strengthen our Statutes. We have not previously made the change because we have sufficient funds for the program and in Wyoming when the Statute is opened up for a change you open up the entire Statute with the risk being change on who the program serves and a raid of funds. The risks of raid of our funds would be much less likely if were changing out Statute to broaden the base of contributors to the fund and/or increase the cap on our surcharge with the overall goal being to increase program funding to pay for a mandated service.
41. **What steps would you need to take if a multi-million dollar fiscal responsibility came to you due to IP-CTS?**
42. Arizona – Inform our board of commissioners, submit funding request with annual budget submission (due Sept. 1, each year, for fiscal year starting July 1st of the next year). While awaiting approval from Governor and State Legislators discuss/draft a new TRS contract possibility with State Procurement Office.
43. California – Without knowing the details of funding sources, registration requirements, and other possible FCC rules pertaining to how the program would operate, the CPUC information about the process we would employ to implement the potential transfer and our best estimate on overall follows. Broadly speaking, we anticipate that we would undertake a five-step process, likely in the following sequence (although some stages might overlap):
44. Evaluate what the program would look like, how to implement it, and associated costs;
45. Propose potentially necessary legislative changes
46. Propose any changes required for the state budget cycle
47. Propose the procurement and the contracting for service providers; and
48. Transition the program elements and migrate users.
49. Colorado – Require legislative changes to remove a $.10 surcharge cap; determine possibility of multi-vendor contracts; rulemaking for changes to current TRS rules with the COPUC; additional staffing
50. Florida – This would require a statutory change.
51. Indiana – Increase the TRS surcharge. (But maybe more depending on the new federal guidelines toward common carriers.)
52. Kansas – We would need to amend state law and administrative rules, file a petition with the KS Utilities Commission to increase the surcharge amount, and add staff. The administrative burden and cost of this shift is unknown and has Kansas policymakers very concerned.
53. Kentucky – First, we would have to identify the potential liability, and then our Commission would have to approve an order to increase the surcharge to an amount sufficient to cover the existing costs and additional liability.
54. Louisiana – No change would be necessary.
55. Minnesota – It depends on how the FCC sets this up. Will we be required to contract with all providers or can we select one provider? Or will we just reimburse the Interstate TRS fund? Will there be stronger requirements for the screening IP CTS users (so that people who don’t really need CTS are not suing the service)? Will equipment need to be interoperable so that consumers/state EDPs don’t need to purchase new equipment if there is a change in provider? One big challenge that may be necessary in Minnesota is that current statues require that the TRS provider(s) operate the relay service (s) within the State of Minnesota. That requirement would most likely need to be changed.
56. Nebraska – Phase in approach perhaps over a five year period. A change in cap on the surcharge would have to be made. Current cap is $.20 per telephone number of functional equivalent.
57. New Mexico – An RFP would need to be started or we would need to amend our current relay contract until it expires. My preference and perhaps the most reasonable would be to add an amendment and add the IP – CTS services with the current vendor. Once the term is up we would then open the RFP up for all of the relay services in the state.
58. North Carolina – We may need to amend State law and administrative rules, and then file a petition with the NC Utilities Commission to increase the surcharge amount. Also, we may need additional staff.
59. Oklahoma – The rates are under the oversight of the Oklahoma Corporation Commission. The state statues would also have to be changed, since they restrict the type of charges which may be added to wireless customers.
60. Oregon – We would need to amend our statute and request a limitation increase.
61. Pennsylvania – The Pennsylvania legislature would have to modify the law to allow PUC to surcharge and the other revenue sources would have to file with the PUC – so we know who to surcharge (for example PUC has not accounting of cell providers in state since PUC does not regulate them)
62. Texas – Texas does have a TRS specific rate. The program is folded into the entire Texas Universal Service Fund charge. The additional cost would need to be calculated into the current rate to determine if an increase is required.
63. Utah – Answers to questions 3 through 7 would depend on the outcome of the process discussed above with state lawmakers.
64. Washington State – Likely would need to go through management channels which may eventually require legislative approval for additional funding to cover the cost of IP – CTS.
65. Wyoming – Currently we are collecting nine cents ($0.09) per access line/wireless account. Our Statute caps the surcharge at twenty-five cents ($0.25). In addition to clarifying the language on which providers should be remitting the surcharge we conceivable may need to increase the surcharge cap. It is hard to predict the full impact of a change in jurisdiction. We do not have current state-specific IP CTS call volume numbers. If we did have numbers I believe that those are over inflated from the ultimate numbers we would be seeing after a transitional period. Under the current model there is a financial incentive for IP CTS providers to get equipment out to as many individuals as possible. IP CTS is the most heavily advertised relay product, and philosophy of mot if not all providers is that if an individual has a hearing loss they can benefit from a captioned telephone until proven otherwise. This means captioned telephones are suggested first and if that doesn’t work then the customer is directed to information on state programs, amplified phones, or other products and services. This approach is the reverse of the approach taken by most State EDP programs which is to assess the individual and determine if they can benefit from amplification and tone control before suggesting a captioned telephone. I believe within a year’s time of the States having oversight you will see an overall decrease in the number of captioned telephones distributed a lower rate of captioned phones being returned or not utilized and an overall increase in customer satisfaction.
66. **How long would it take for you to prepare for a shift in fiscal responsibilities?**
67. Arizona – 2 – 3 years
68. California – Each of the stages mentioned in question 3 could take 12-18 months or 5 to 7.5 years.
69. Colorado – Timing is unknown at this time
70. Florida – Would be based on the legislative process. The Florida Legislature convenes annually for a 60 day regular session.
71. Indiana – One year or less
72. Kansas – I agree with the others that the move would require a transition plan and it could take a least a couple of years (2-years) to transition to this shift. Also, need a minimum of two (2) years to build adequate funds to allow us to get additional staffing.
73. Kentucky – 6 – 12 months
74. Louisiana – Less than 30 days
75. Minnesota – This would depend on the parameters (see the answer to question 3). In addition, it would depend on numbers. States would need to know historic call volume statistics so that they can ramp up and forecast.
76. Nebraska – Depends on the extent of quality of assurance responsibilities that may be assumed and any other standards for oversight – no just financial.
77. New Mexico – 12 months at least from the effective date.
78. North Carolina – This would require a transition plan and it could take at least a couple of years (2 - years) to transition to this shift. Also, need a minimum of two (2) years to build adequate funds to allow us to get additional staffing.
79. Oklahoma – It is estimated it would take two to three years.
80. Oregon – It would take at least one to two years.
81. Pennsylvania – Who knows – it is up to the lawmakers.
82. Texas – Too many variable, anywhere from 4 months to 2 years.
83. Utah – Answers to questions 3 through 7 would depend on the outcome of the process discussed above with state lawmakers.
84. Washington State – I assume it could take up to 2 or 4 years.
85. Wyoming – There are several unknown factors which make giving a definitive answer difficult. However, I believe Wyoming could fully implement a change in jurisdiction within a three-year time frame.
86. **Will your state allow multiple vendor contractors for IP-CTS?**
87. Arizona – Arizona’s preference would be to have single vendor providing all of its TRS.
88. California – California’s CRS program encourages multi-vendor contracts, through carrier – specific contracts. The California public contracting process demands commitment of significant personnel resources, and is complex, multi-faceted, and time-consuming. Given the need to develop requests for proposal, to review those proposals and select successful bidder(s), to negotiate contracts and then obtain contract approval from the relevant California fiscal control agencies also will require one year to 18 months. Further, the CPUC is concerned that the transition of IP CTS to the states may make it impossible for the CPUC to continue to provide relay service on a multi-vendor basis. In California, the constituent base has advocated for choice among service providers. The consumer response on multiple vendors for CRS has been very favorable. The CPUC supports rules governing the provision of IP CTS and/or the transfer of administration to the states that would provide the states the flexibility to offer IP CTS and/or the transfer of administration to the states that would provide the states the flexibility to offer IP CTS on a multi-vendor basis.
89. Colorado – Unknown at this time
90. Florida – This would require a statutory change in Florida.
91. Indiana – Yes
92. Kansas – Not sure whether they would allow multiple vendors. At present without regulation changes the answer would be no.
93. Kentucky – I don’t know, in the past TRS has always been performed by a single source contract. I’m not sure if our procurement process would allow multiple vendors. Additionally, it would depend on how the FCC ruled on the issue and ordered state to pay for this service. Current laws do not permit this.
94. Louisiana – RAB would likely continue using one provider for all TRS and IP – CTS services.
95. Minnesota – Current statutes allow our agency to contract with one or more qualified vendors for the provision of TRS. However, this doesn’t mean that our agency would elect to contract with multiple (or all) providers. While our state does not require that we contract with the lowest cost vendor, we do have a fiscal responsibility to our telephone rate payers, and we would be looking to contract with the vendor(s) who can provide the best service at the lowest cost. We would choose not to contract with a provider that we felt was unscrupulous and/or whose service was sub-par.
96. Nebraska – No
97. New Mexico – I am unsure how wasteful it will be to contract and set aside funds for various vendors (not knowing how much will be spent) and then have to explain why it hasn’t
98. North Carolina – I don’t know, I would need to confer with the NCUC. Based on history with the multiple vendors for the TRS in California, it was a “bust” so I would be leery of trying to approach. Again, this may require additional staffing.
99. Oklahoma – We currently have a single provider for TRS. I would have to research if multiple vendor contracts are allowed.
100. Oregon – Yes
101. Pennsylvania – No data to prepare an informed reply to question.
102. Texas – State law allows for one vendor.
103. Utah – Answers to questions 3 through 7 would depend on the outcome of the process discussed above with state lawmakers.
104. Washington State – Presently, we do not handle multiple vendor contractors for TRS services and may continue with the same RFQQ and contracting process with 1 vendor for IP – CTS.
105. Wyoming – Our State does allow for multiple vendor contracts. Our current relay contract is not a multiple vendor contract.
106. **Would your state prefer direct contract with IP-CTS vendors or to be billed by the FCC and/or the fund administrator?**
107. Arizona – Preference would be for it to be included in the state’s current TRS invoice process, which we pay the vendor directly.
108. California – If the centralized registration and verification program remains under federal jurisdiction, then the CPUC has no opinion on the implementation details.

If, however, the FCC mandates that states assume responsibility for IP CTS, then California recommends that the states determine the registration and verification processes (This concern harkens back to the issue of how much authority a state commission will have over the providers of IP CTS. Without requisite authority, a state IP CTS program could be limited to only what the FCC authorizes; it could be jurisdictionally impossible to add elements or features even in the face of a strong consumer demand.) In California, when an eligible consumer applies for landline CTS, the DDTP (The Deaf and Disabled Telecommunications Program consist of the California Relay Service (CRS) and the California Telephone Access Program (CTAP) which lends equipment to eligible subscribers) requires verification of disability before lending a device to a user. For captioning telephone service costs to be reimbursed, the CPUC limits operation landline captioned telephone devices to California. In addition, the CPUC’s administrator assesses landline CTS users for appropriateness of other equipment (e.g. amplified phones, etc.), potentially in lieu of or in addition to landline CTS. If the FCC adopts a centralized database (TRS-URD) which would include IP CTS, then whether California would retain this verification and registration system, or adopt a different system, would depend on several factors: the historical data of number of users and volume of calls, usage forecasts for all programs, and evaluations of existing and potential future program contracts. The data to be gleaned would provide useful indicators to enable the CPUC to determine how best to continue California’s assistive communications programs for deaf and disabled communities.

Should the FCC transfer administration of IP CTS to the states, California and other states would need to know the extent to which states would retain responsibility for current IP CTS users and equipment. Specifically, the states would need to know how to dispose of, register, redeploy, or otherwise repurpose existing equipment from the federal program. Beginning a new program and transferring an existing one are very different propositions. For instance, if users already have equipment under the federal program, how would California verify their intended usage under the California program? What if the current IP CTS equipment were not interoperable with the chosen California contractor(s)? The CPUC would need time to work with its advisory boards, user community, contracting agencies and equipment and service providers to determine program rules.

If the FCC orders the transfer of IP CTS programs to the states, then California recommends that the FCC clean and verify its database of users so that the CPUC could more easily determine the authorized number of users in California. After determining the number of users, California would request the calling patterns of those users, including time of day, holding time, and call origination and termination information. Without this information, it would not be possible for California to evaluate how to proceed to contracting with potential service suppliers.

1. Colorado – Direct contract through this may require additional staffing
2. Florida – This would require a statutory change in Florida
3. Indiana – Direct contact with vendors
4. Kansas – We strongly prefer that the IP-CTS be billed by the FCC’s fund administrator.
5. Kentucky – Again, it would depend on how the FCC orders state to comply. However, I would think that the state would like to be in charge of the rate paid therefore, having direct contracts with the providers.
6. Louisiana – We would likely not require the FCC administrator as a go-between. RAB has its own professional services. (Legal counsel, CPA, and professional auditors)
7. Minnesota – As the statutes are currently written, our agency is required to “contract with one or more qualified vendors that serve persons who have communications disabilities to provide telecommunications relay services.” I don’t believe that we would be able to just reimburse the interstate TRS administrator without a change in regulations. As for our state’s preference, that would be more of a policy decision, and would need to be discussed with our commissioner.
8. Nebraska – By Fund administrator
9. New Mexico – Direct
10. North Carolina – We would prefer the IP-CTS be billed by the FCC’s fund administrator.
11. Oklahoma – I appreciated Lori’s comments from Wyoming and at this time, would agree with her position. “I would prefer a direct contract with IP-CTS vendor(s). My concern is that the methodology used by the FCC or the TRS Fund Administrator would similar to the methodology used for the NDBEDP program. We’ve heard that many states felt the reimbursements were slow and the reporting requirements to be reimbursed were cumbersome. Additionally, by direct contracting we can ensure that the services meet the needs of the citizens in our state through mechanisms like competition and the use of liquidated damages.”
12. Oregon – We would prefer direct contracts with IP-CTS vendors
13. Pennsylvania – Fund administrator just like universal service administrator
14. Texas – I don’t trust the fund administrator as we do not know how much Texas would be billed or how there calculation is derived. If we had to take it on, I would prefer to contract directly. This would give more control to the state.
15. Utah – Answers to questions 3 through 7 would depend on the outcome of the process discussed above with state lawmakers.
16. Washington – We presently have a direct contract with the CTS vendor
17. Wyoming – I would prefer a direct contract with IP-CTS vendor(s). My concern is that the methodology used by the FCC or the TRS Fund Administrator would similar to the methodology used for the NDBEDP program. We’ve heard that many states felt the reimbursements were slow and the reporting requirements to be reimbursed were cumbersome. Additionally, by direct contracting we can ensure that the services meet the needs of the citizens in our state through mechanisms like competition and the use of liquidated damages.
18. **Are there any rules the FCC would have to implement before your state could take on the responsibility?**
19. Arizona – Yes, higher service standards. Fines for not meeting any standards.
20. California – Consistent with California’s concerns about the potential financial impact, the CPUC recommends that the FCC preserve the ability of the states to implement one or more alternative registration processes that would include protections against waste, fraud, and abuse. In this way, the Commission would be establishing a benchmark for states with more limited resources, but would allow states, such as California, with an extensive, multi-vendor TRS program to tailor the registration process to more closely align with existing state processes. This approach also would track the FCC’s view that states “are physically closer to the residents using this service” and “have already been undertaking the role of certifying consumers” who receive state-provided equipment to participate in existing CTS programs (see NPRM reference in question 2).

Further, states have varying degrees of authority to regulate IP-based services. For example, California Public Utilities (PU) Code § 710, enacted in 2012, “prohibits” the CPUC from exercising “regulatory jurisdiction or control over Voice Over Internet Protocol [VoIP] and Internet Protocol [IP] enabled services” subject to certain exceptions set forth in that section or elsewhere in the state statute, or” as expressly delegated by federal law.” From the CPUC’s perspective, the “express delegation” must be both explicit and very clear. In the absence of clarity, the states face endless disputes with service providers over a state commission’s ability to compel service providers to comply with state rules intended to protect consumers using IP CTS, and to protect the program against waste, fraud, and abuse.

Accordingly, the FCC must provide the states with guidance as to how they may administer provision of a service over which they have uncertain authority. To that end, and to the extent that it may under federal law, the FCC should delegate authority to the states to oversee the providers of IP CTS. This is especially critical if the FCC assumes that the states will be committing their public financial resources to fund provision of IP CTS.

Finally, should the FCC move forward with the transfer of IP CTS administration to the states, the CPUC urges the FCC to allow the states some flexibility in administering their programs? As is the case today with TRS, California includes in its CRS program elements that exceed federal requirements. The CPUC would want the same flexibility in overseeing IP CTS. And, that flexibility should include allowing states enforcement authority so as to ensure that eligible consumers are able to access the service, the service is provided consistent with FCC and State rules, and that waste, fraud, and abuse can be prevented and, ultimately, eliminated.

1. Colorado – IP CTS service standards; mandated by the FCC (not voluntary); allow states to certify IP CTS users
2. Florida – This would require a statutory change in Florida.
3. Indiana – Yes.

1. Redefine “Common Carrier” to include all forms of current and future telecommunication needs. (Currently, only defined as wire or radio).

2. Require “Newly defined common carriers” to remit to each state’s program for funding of TRS.

3. Suggest states use the term “common carrier” after it is newly defined by FCC.

1. Kansas – Yes, the internet companies that provide internet services would need to be onboard and a part of this program.
2. Kentucky – The FCC would have to change regulations that say states have to provide this service and the manner in which it should be provided.
3. Louisiana – RAB is and will continue to be in compliance with all FCC critieria.
4. Minnesota – Yes, CTS should be a mandated TRS service (as opposed to an approved service). Also, one of the biggest issues with IP CTS and VRS, which is unlike other forms of relay services, is the proprietary/non-interoperable equipment. With TTY-based relays services, the consumer can use any TTY, from any manufacturer, to make a relay call or point-to-point (TTY to TTY) call. With VRS and IP CTS, the devices are tied to a particular service provider. This causes a host of issues. If, for example, the states take on responsibility for IP CTS and Minnesota is able to contract with only on IP CTS provider, all consumers in Minnesota who are currently using non-contracted IP CTS providers’ phones would need new equipment in order to use the contracted IP CTS provider. If Minnesota then changed IP CTS providers three years later, all IP CTS users in our state would need new equipment; this would be very costly and complicated. Currently, many of the IP CTS and VRS providers distribute their equipment free of charge (or at a reduced rate) in order to attract users. If states take on the responsibility for these services, it is conceivable that the providers will no longer offer free/low cost equipment. Since Minnesota has an EDP program (and one with pretty liberal income eligibility guidelines), there would be significant costs to the EDP program in order to distribute the internet-based relay devices. Also, there needs to be stronger requirements for the screening of IP CTS users. Currently, anyone that has hearing loss and can get a medical professional to

sign the third party certification can use IP CTS. Consumers need to be properly screened to determine the device/service that best meets their telecommunications needs. For many consumers with hearing loss, an amplified telephone may meet their needs. States will be reluctant to take on the responsibility for internet-based TRS services that are ripe with misuse and fraud.

1. Nebraska – FCC needs to take a position on IP telephony in general and quit making the distinction between ‘information services’ versus ‘telecommunications services’ (or redefine ‘information services’ altogether). Also, to the extent we define IP as intrastate, to what extent does our exercise over quality of service begin and end??
2. New Mexico – I do not have sufficient data to give an informed reply.
3. North Carolina – Yes, the internet companies that provide internet services would need to be onboard and a part of this program. Our response would be different because there is a lot to consider when adding VRS, RTT and especially, with future technology. For instance, we should consider the mobility of society, many households no longer use traditional landlines, also many of them are “cord-cutters”; e.g., streaming videos. Some of the challenges are listed below:

1. Mobility of society – Due to the mobility of our society it is difficult to keep up with the pace, and follow the traditional billing practices.

2. Rapid changes – Also, with the rapid changes in technology we need to have a consolidated, focused way to keep pace with the respect to accessibility which will be a challenge for State agencies to administer programs such as the RTT and VRS.

3. Wide variations – Many states differ from each other in how they administer and oversee contracts. For example, we have wide variations in state laws and regulations regarding how business (e.g., contract administration, funding mechanism) is conducted. This will be a challenge for State agencies to oversee and administer the RTT and VRS.

4. Paucity of Personnel – Another challenge for state agencies across the country is the paucity of personnel with the requisite knowledge and skills to administer contracts, so this is not feasible. It is best to leave it at the federal level for efficient and effective management of services.

5. Staff Resources – Another challenge is the FCC lacks the capacity (staff resources) to manage such a complex and rapidly changing technological landscape. It’s difficult enough already.

1. Oklahoma – I think it would be important that the service be mandated by the FCC, to demonstrate to the state legislature and utility commission that the service is a requirement to provide. There would also need to be flexibility given to meet any type of deadline to implement the service at the state level, if unanticipated problems are encountered.
2. Oregon – I can’t think of any at this time.
3. Pennsylvania – I’m sure but do not have sufficient data to give an informed reply.
4. Texas – I borrowed this answer as I couldn’t say it any better, “I think it would be important that the service be mandated by the FCC, to demonstrate to the state legislature and utility commission that the service is a requirement to provide. There would also need to be flexibility given to meet any type of deadline to implement the service at the state level, if unanticipated problems are encountered.”
5. Utah – Answers to questions 3 through 7 would depend on the outcome of the process discussed above with state lawmakers.
6. Washington State - Yes
7. Wyoming – It would helpful if the FCC would require the fund administrator to report state-specific Internet-based relay call data. Prior to Wyoming taking on responsibility for IP-CTS the FCC would need to order the change in jurisdiction. While we do provide some services that are not mandated it would be helpful if they mandated captioned telephone service. It would also be helpful if we encountered legislative issues or problems in the transition of jurisdiction and implementation to be able to ask for a waiver or time-extension.