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September 30, 2019

Marlene H. Dortch, Secretary
Office of the Secretary
Federal Communications Commission
445 Twelfth Street, S.W., RM TW-A325
Washington, DC 20554

Re: Misuse of Internet Protocol (IP) Captioned Telephone Service; CG Docket No. 13-24

Dear Ms. Dortch:

The purpose of this letter is to bring to your attention developments in accessibility related to mobile devices, and to suggest how these developments should impact measures to ensure that Internet Protocol Captioned Telephone Service (IP CTS) remains sustainable for those who need it.

On December 3, 2018, Microsoft launched free captioning for Skype calls. The captions work for both one-on-one calls and groups calls, as well as for both voice and video calls. Microsoft explained that the captions are “optimized to be fast, continuous, and contextually updated as people speak.”¹ The captioning is available on Skype’s android and iOS applications, as well as on a PC or Mac.

On May 7, 2019, Google announced that it would provide a service called Live Relay, which will caption phone calls and provide people who cannot speak the ability to type their responses, which will then be vocalized by the Google Assistant. This service will have an important advantage compared to other automatic speech recognition (“ASR”) solutions. Namely, the captioning will occur on-device rather than in the cloud. This will guarantee that conversations remain completely private and will increase the speed at which the captions are generated. And using Google’s captioning service will not consume users’ data, which is frequently capped by wireless plans.

On August 26, 2019, the Commission sought comment on three applications to provide IP CTS using ASR. None of those companies will offer on device captioning. The captions will be generated in the cloud. These solutions, therefore, cannot guarantee the level of privacy or speed provided by Google’s on-device captioning. Moreover, unlike Google’s Live Relay service, the three solutions will consume users’ data. VTCSecure, in its application, stated that with its service “a remote user can see the person they are talking to and read their lips ...

¹ See <https://blogs.skype.com/news/2018/12/03/introducing-live-captions-and-subtitles-in-skype/>

something no other IP CTS provider offers today.”² Skype, however, captions video calls for free and even captions group video calls.

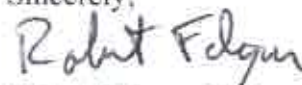
In *Misuse of Internet Protocol (IP) Captioned Telephone Service*, Report and Order, Declaratory Ruling, Further Notice of Proposed Rulemaking, and Notice of Inquiry, CG Docket No. 03-123 at ¶ 122 (June 8, 2018), the Commission proposed to require that “each prospective IP CTS user undergo an objective assessment by a qualified and independent entity that will determine whether the individual has a ‘hearing loss that necessitates use of captioned telephone service.’” The Commission further proposed that State Equipment Distribution Programs (“EDPs”) conduct those assessments. *Id.* at ¶ 123.

In light of the availability of free captioning solutions from Skype and Google, the Commission should further require that EDPs, or other assessors, inform consumers who need captions about the availability of free options, including their advantages over other captioned telephone services. Doing so will benefit consumers by providing them with additional options, as well as reduce the reliance on costly captioned telephone service.

Proactively educating consumers about these free options is essential because unlike the paid captioned telephone service providers, Google and Microsoft will not actively market their free services to individuals who are deaf or hard of hearing. In fact, based on RAZ Mobility’s experience, many EDP managers do not even know about the availability of these free options. The reality is that without a requirement that EDPs (or other assessors) educate consumers about free captioned telephone service, consumers, many of whom are seniors and not particularly tech savvy, will not learn about them. Instead they will rely on costly captioned telephone service that will not be as feature rich as Skype or as private and quick as Live Relay.

Skype and Google either have developed or are developing exciting free captioning telephone services for voice and video calls. Perhaps Apple will follow. The easiest way for the Commission to reduce the cost of IP CTS and guarantee the TRS fund’s stability, as well as to increase consumer choice, is to put in place some simple rules to ensure that consumers are educated about these free options. It would be a shameful waste of universal service fund resources for consumers to rely on expensive IP CTS service, when they may very well be more satisfied with free options.

Sincerely,



Robert Felgar, CEO
RAZ Mobility, LLC

cc: Eliot Greenwald (by email)
Michael Carowitz (by email)
Robert Aldrich (by email)
Michael Scott (by email)

² See VTCSecure, LLC Internet Based TRS Certification Application at 2.