

NASRA RESOLUTION TO MAINTAIN FEDERAL FUNDING OF IP-CTS

Whereas, in August 2013, the Federal Communications Commission (“Commission,” or “FCC”) issued an order indicating its preference to transfer the responsibilities for administering and overseeing Internet-protocol captioned telecommunications service (IP-CTS) to state telecommunications relay service (TRS) programs;

Whereas, the Commission also indicated that it is reconsidering its earlier decision to treat IP-CTS as an entirely interstate service, and may propose that IP-CTS be treated as traditional CTS is treated, with result that state relay programs would be required to compensate providers for intrastate IP-CTS calls;

Whereas, IP-CTS providers are not able to ascertain the origination and destination of IP-CTS calls in a manner that would allow for compensation for these calls to be billed to the states;

Whereas the National Association of State Relay Administration (NASRA) is comprised of individuals who are directly involved in the administration or oversight of telecommunications relay services for their respective states. NASRA members are typically state administrators or public service/public utilities commission employees;

Whereas NASRA members are aware of increasing pressure within their respective states and state legislatures for the deregulation of telecommunications services, and the resulting threats to state universal service funds, which quite often provide the monies used to compensate providers for intrastate relay calls;

Whereas NASRA and its members would like to enter into conversations with the Commission about (a) the setting of national criteria for eligibility for IP-CTS service, (b) the setting of national standards for service-quality for IP-CTS, and (c) allocation of the registration and verification functions when giving out IP-CTS equipment;

THEREFORE, BE IT RESOLVED that NASRA strongly opposes any change by the Commission to treat IP-CTS as traditional CTS is treated, with result that state relay programs would be required to compensate providers for intrastate IP-CTS calls;

AND that we ENCOURAGE the Commission to join NASRA and its members in conversations about (a) the setting of national criteria for eligibility for IP-CTS service, (b) the setting of

national standards for service-quality for IP-CTS, and (c) allocation of the registration and verification functions when giving out IP-CTS equipment.

ADOPTED on September 24, 2014.

NATIONAL ASSOCIATION OF STATE RELAY ADMINISTRATION