



# California Coalition

Of Agencies Serving Deaf & Hard of Hearing Persons, Inc.

## REGION I

Patricia Sieglen-Perry,  
Executive Director  
Deaf Community Services of  
San Diego, Inc.  
3930 Fourth Avenue, Suite 300  
San Diego, CA 92103  
[www.dcsosfd.org](http://www.dcsosfd.org)

November 12, 2015

## Via Electronic Filing

## REGION II

Lisa Price, Regional Director  
Center on Deafness Inland  
Empire  
3576 Arlington Avenue #211  
Riverside, CA 92506  
[www.codie.org](http://www.codie.org)

Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12th Street, S.W.  
Washington, DC 20554

## REGION III

Amy Grindrod, Regional Director  
Orange County Deaf Equal  
Access Foundation  
6022 Cerritos Avenue  
Cypress, CA 90630  
[www.ocdeaf.org](http://www.ocdeaf.org)

## Re: Notice of Ex Parte Meeting; CG Docket Nos. 10-51 and 03-123

Dear Ms. Dortch:

## REGION IV

Patricia Hughes, Ph.D., CEO  
Greater Los Angeles Agency on  
Deafness, Inc.  
2222 Laverna Avenue  
Los Angeles, CA 90041  
[www.gladinc.org](http://www.gladinc.org)

On November 9, 2014, Sheri A. Farinha, Vice Chair, California Coalition of Agencies Serving the Deaf and Hard of Hearing, Inc. (“CCASDHH”); Claude Stout, Executive Director, Telecommunications for the Deaf and Hard of Hearing, Inc. (“TDI”) and TDI’s counsel, Danielle Burt of Morgan, Lewis & Bockius LLP; Zainab Alkebsi, Policy Counsel, National Association of the Deaf (“NAD”); and Lise Hamlin, Director of Public Policy, Hearing Loss Association of America (“HLAA”) participated in a meeting (either in person or by phone) with:

## REGION V

Julianna Fjeld, Regional Director  
Tri County-GLAD  
702 County Square Drive,  
Suite 101  
Ventura, CA 93003  
[www.tcglad.org](http://www.tcglad.org)

- Karen Strauss, Gregory Hlibok, Eliot Greenwald, and Darryl Cooper of the Consumer & Governmental Affairs Bureau (“CGB”); and
- David Schmidt and Andrew Multz of the Office of Managing Director (“OMD”)

## REGION VI

Michelle Bronson,  
Executive Director  
Deaf and Hard of Hearing  
Service Center, Inc.  
5340 North Fresno Street  
Fresno, CA 93710  
[www.dhsc.org](http://www.dhsc.org)

The Consumer Group representatives discussed their Joint Petition for Waiver and Rulemaking of the Eligibility Rule Regarding Social Security Number (SSN).<sup>1</sup> They talked about consumers’ privacy and security concerns with being required to provide the last four digits of their SSNs to register for VRS and their request for the Commission to consider allowing consumers to choose to provide an alternative form of verification (e.g., driver’s license, utility bill) to register. They emphasized that the SSN requirement results in unequal treatment since it applies only to the deaf or hard of hearing persons registering to use VRS and does not apply to hearing users that may place or receive a VRS call.

## REGION VII

Sheri A. Farinha, CEO  
NorCal Center on Deafness  
4708 Roseville Road, Suite 112  
North Highlands, CA 95660  
[www.norcalcenter.org](http://www.norcalcenter.org)

## REGION VIII

Deborah O’Willow, CEO  
Deaf Counseling, Advocacy &  
Referral Agency  
14895 E. 14th Street, Suite 200  
San Leandro, CA 94578  
[www.dcara.org](http://www.dcara.org)

Based on the discussion, the Consumer Group representatives understand that the TRS User Registration Database (“TRS-URD”) will maintain first name, last name, address, and date of birth of registrants and will not maintain SSNs of

<sup>1</sup>

See Joint Petition, CG Docket Nos. 10-51 and 03-123 (filed Oct. 1, 2015).

registrants. It is their understanding that the SSNs of registrants will be provided only “one-way,” meaning to the TRS Fund Administrator to verify a registrant’s identification. If a registration is not accepted requiring an individual to resubmit, such individual will need to provide the required information again, including the SSN, because such information is not being maintained.

The Consumer Groups suggest the Commission should, at a minimum, provide information to consumers about how their SSN information will be used and might provide a simple demonstration of the TRS-URD registration process from collection to successful registration. The Commission should also consider providing additional messaging to assure consumers that SSN information will be protected when it is required to be produced.

Respectfully submitted,

/s/

Sheri A. Farinha

cc (by e-mail):

Karen Strauss  
Gregory Hlibok  
Eliot Greenwald  
Darryl Cooper  
David Schmidt  
Andrew Mulitz

Claude Stout  
Zainab Alkebsi  
Lise Hamlin  
Danielle Burt