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April 28, 2016

*Via ECFS*

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

**Re: Docket Nos. 10-51 & 03-123 - Notice of Ex Parte**

Dear Ms. Dortch:

Telecommunications for the Deaf and Hard of Hearing, Inc. (“TDI”), National Association of the Deaf (“NAD”), Association of Late Deafened Adults, Inc. (“ALDA”), Deaf and Hard of Hearing Consumer Advocacy Network (“DHHCAN”), American Association of the Deaf-Blind (“AADB”), Cerebral Palsy and Deaf Organization (“CPADO”), Deaf Seniors of America (“DSA”), and Hearing Loss Association of America (“HLAA”) (collectively, “Consumer Groups”) submit this letter to urge the Commission to ensure that consumers are required to register with the Telecommunications Relay Service user registration database (“TRS-URD”) *only once* and not for each provider.

Consumers must have a wide selection of choices to ensure functional equivalency as previously explained in the *Consumer Groups’ TRS Policy Statement - Functional Equivalency of Telecommunications Relay Services: Meeting the Mandate of the Americans with Disabilities Act*.<sup>1</sup> Consumer Groups are concerned that the TRS-URD may be developed to make consumers separately register with each provider, which could have the unintended consequence of depriving consumers of access to their chosen TRS service provider. In comparison, the benefit of allowing consumers to register with the TRS-URD only once is they may promptly switch from a default provider to another TRS service provider. A single TRS-URD registration would therefore streamline the process and promote choice.

Consumer Groups also recommend that consumer registration for the TRS-URD be transparent and explained to consumers in advance. For instance, the Commission should create a video providing information in American Sign Language (“ASL”) along with captions and with video descriptions of key visual elements for individuals who are blind

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<sup>1</sup> Letter from Tamar E. Finn and Brett P. Ferenchak, Counsel to TDI, to Marlene H. Dortch, Secretary, FCC, CG Docket Nos. 03-123 and 10-51, attach. (filed Ap. 12, 2011).

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or visually impaired to explain in detail the information to be collected from consumers for the TRS-URD registration and any additional data that might need to be collected if there are problems with registration. Such video should be released by the Commission (as opposed to individual providers) well in advance of the deadline to complete the TRS-URD registration. This will help make the registration process more user-friendly and could explain the mechanisms that will be used to protect consumer personal information and circumstances, if any, that would require a consumer to complete a TRS-URD registration after the initial registration. In addition, a downloadable text version of the information should also be available on the Commission's website.

Consumer Groups appreciate the Commission's attention to these matters. If there are any questions, please feel free to contact us.

Respectfully submitted,

*/s/ Danielle Burt*

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