



PUBLIC NOTICE

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FCC ENFORCEMENT ADVISORY

ENFORCEMENT BUREAU REMINDS INTERNET-BASED TELECOMMUNICATIONS RELAY SERVICE PROVIDERS OF EMERGENCY CALLING REQUIREMENTS

In 2008, the Federal Communications Commission issued rules governing 911 emergency call handling requirements for providers of certain Internet-based forms of Telecommunications Relay Services (TRS).¹ The purpose of these requirements is to ensure that individuals with hearing or speech disabilities who use Internet-based TRS receive 911 service that is comparable to that received by traditional telephone network TRS users. Because of the public safety risks that would result from an Internet-based TRS provider's failure to complete a 911 call properly, including passing location-identifying information to the applicable emergency services organization, the Enforcement Bureau issues this Enforcement Advisory to remind such providers, especially IP Relay and VRS providers of these requirements. In particular, we emphasize that the 911 emergency call handling requirements apply regardless of the equipment or software used by consumers seeking emergency assistance via Internet-based TRS.

The 911 emergency call handling rules for IP Relay and VRS providers include, among other things, the following requirements:²

¹ *Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities, E911 Requirements for IP-Enabled Service Providers*, Report and Order and Further Notice of Proposed Rulemaking, 23 FCC Rcd 11591 (2008); *Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities, E911 Requirements for IP-Enabled Service Providers*, Report and Order and Further Notice of Proposed Rulemaking, 23 FCC Rcd 5255 (2008). TRS permits persons with hearing or speech disabilities to access the telephone system to call other telephone users. For example, a TRS user contacts a relay provider through a device (e.g., a text telephone or videophone), and is connected to a communications assistant (CA) who, in turn, places a telephone call to the person the TRS user wishes to call. The CA then communicates to the called party what the relay user has communicated to the CA, and relays back to the TRS user what the called party says. With Internet-based TRS, calls between the relay provider and the person with a hearing or speech disability are made via the Internet. The two most commonly used forms of TRS are Internet Protocol Relay (IP Relay) and Video Relay Service (VRS).

² This Enforcement Advisory highlights key emergency calling requirements. See section 64.605 of the Commission's rules, 47 C.F.R. § 64.605, for a comprehensive list of all emergency calling requirements applicable to Internet-based TRS providers. Certain of the requirements only apply to IP Relay (text-to-voice) and VRS providers.

- IP Relay and VRS providers must transmit all 911 calls³ -- as well as automatic number identification (ANI, generally the caller's 10-digit number), the caller's registered location,⁴ the name of the Internet-based TRS provider, and the communications assistant's (CA's) identification number for each call -- to the public safety answering point (PSAP), or other appropriate local emergency authority that serves the caller's registered location;
- IP Relay and VRS providers must answer incoming emergency calls before any non-emergency call, *i.e.*, prioritize the emergency calls and move them to the top of the queue;
- IP Relay and VRS providers must route all 911 calls through the use of ANI, and, if necessary, pseudo-ANI, via the dedicated wireline E911 network to the PSAP, or appropriate local emergency authority that serves the caller's registered location;
- If the Internet-based TRS is capable of being used from more than one location, the IP Relay and VRS provider must offer the consumer one or more methods of updating his or her registered location at will and in a timely manner. At least one of those methods must allow the user to update his or her registered location from the equipment he or she uses to access the Internet-based TRS;
- In the event that one or both legs of the emergency call (*i.e.*, either between the TRS user and the CA or between the CA and the PSAP/other emergency authority) is disconnected, the IP Relay or VRS provider must immediately re-establish contact with the TRS user and/or the appropriate PSAP or other emergency authority.

Internet-based TRS providers must comply with the emergency calling requirements regardless of the equipment or software used by consumers utilizing Internet-based TRS. This means that whether a consumer is placing a 911 emergency call via Internet-based TRS using customized equipment and software provided by an Internet-based TRS provider, off-the-shelf hardware and software that might be purchased or acquired from a source other than an Internet-based TRS provider, or some combination thereof, Internet-based TRS providers must fully comply with the Commission's emergency calling requirements. Noncompliant Internet-based TRS will be ineligible for compensation from the interstate TRS Fund. We note that violation of the Commission's rules and orders may also subject an Internet-based TRS provider to severe penalties, including substantial monetary forfeitures.⁵

For additional information regarding compliance and enforcement of the emergency calling requirements for Internet-based TRS providers please contact Janet Sievert of the Enforcement Bureau at 202-418-1362 or at janet.sievert@fcc.gov. To request general information on emergency calling requirements for Internet-based TRS providers, please contact Diane Mason of the Consumer & Governmental Affairs Bureau's Disability Rights Office at 202-418-7126 or at diane.mason@fcc.gov. Media inquiries should be directed to David Fiske at 202-418-0513 or david.fiske@fcc.gov.

³ "All 911 calls" is defined as "any communications initiated by [a] VRS or IP Relay user dialing 911." *See* 47 C.F.R. § 64.605(b)(2)(ii).

⁴ Internet-based TRS providers must obtain from their users the physical location at which the service will first be used when the user registers for a 10-digit number, and must provide an easy way for users to update their information if it changes. 47 C.F.R. § 64.605(a)(4).

⁵ *See* 47 U.S.C. § 503.

To request materials in accessible formats for people with disabilities (Braille, large print, electronic files, audio format), send an email to fcc504@fcc.gov or call the Consumer & Governmental Affairs Bureau at 202-418-0530 (voice), 202-418-0432 (TTY). You may also contact the Enforcement Bureau on its TTY line at 202-418-1148 for further information about this Enforcement Advisory, or the FCC on its TTY line at 1-888-Tell-FCC (1-888-835-5322) for further information about the emergency calling requirements for Internet-based TRS providers.

Issued by: Chief, Enforcement Bureau

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