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EFFECTIVE DATE AND COMPLIANCE DEADLINES FOR VIDEO RELAY SERVICE INTEROPERABILITY RULE AMENDMENTS AND COMMENT DEADLINES FOR FURTHER NOTICE OF PROPOSED RULEMAKING

CG Docket Nos. 10-51 and 03-123

On January 17, 2017, the Consumer and Governmental Affairs Bureau (CGB) of the Federal Communications Commission (Commission), pursuant to delegated authority, adopted a Report and Order and Further Notice of Proposed Rulemaking in the above referenced proceeding. The *VRS Interoperability Order* amends the Commission's rules to incorporate by reference: (1) The US Video Relay Service (VRS) Provider Interoperability Profile, Version 15, SIP Forum Document Number: VRS US Providers Profile TWG-6-1 (Oct. 14, 2015) (VRS Provider Interoperability Profile); (2) the Interoperability Profile for Relay User Equipment, draft-vrs-rue-dispatch-00 (July 20, 2016) (RUE Profile); and (3) Internet Engineering Task Force (IETF) Request for Comments (RFC) 6351, xCard: vCard XML Representation (August 2011) (xCard XML Format). The *VRS Interoperability FNPRM* sought comment on the scope of application of the technical standards of the RUE Profile.

A summary of the *VRS Interoperability Order* and amended rules was published in the Federal Register on April 27, 2017, setting the effective date of the order and its final rules for May 30, 2017. For each standard incorporated into the rules, the Commission also set a compliance deadline for providers to meet the requirements of the standard. The compliance deadline for meeting the standards of the RUE Profile is April 27, 2018, and the compliance deadline for meeting the standards of the xCard XML format is October 24, 2017. However, after the *VRS Interoperability Order* was adopted, the Commission suspended the effectiveness of the compliance deadline for meeting the standards of the VRS Provider Interoperability Profile, pending resolution of a separate rulemaking proceeding.

A summary of the VRS Interoperability FNPRM was also published in the Federal Register on

¹ Structure and Practices of the Video Relay Service Program, Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities, Report and Order and Further Notice of Proposed Rulemaking, 32 FCC Rcd 687 (CGB 2017) (VRS Interoperability Order when referring to the Report and Order and VRS Interoperability FNPRM when referring to the Further Notice of Proposed Rulemaking).

² FCC, Structure and Practices of the Video Relay Services Program, 82 FR 19322 (Apr. 27, 2017).

³ The effective date is set as 30 days after Federal Register publication. *VRS Interoperability Order*, 32 FCC Rcd at 696, para. 33.

⁴ *Id.* at 690, 692-693, paras. 8, 14, 16.

⁵ This compliance deadline is 365 days after the date of publication in the Federal Register. *Id.* at 692, para. 14.

⁶ This compliance deadline is 180 days after publication in the Federal Register. *Id.* at 693, para. 16.

⁷ See Structure and Practices of the Video Relay Service Program, Telecommunications Relay Services and Speechto-Speech Services for Individuals with Hearing and Speech Disabilities, Report and Order, Notice of Inquiry, Further Notice of Proposed Rulemaking and Order, 32 FCC Rcd 2436, 2488-89, paras. 136-38 (2017).

April 27, 2017. The comment deadline for these proposals is 45 days after publication in the Federal Register and the reply comment deadline is 75 days after publication in the Federal Register. Specifically, comments must be filed on or before June 12, 2017, and reply comments must be filed on or before July 11, 2017.

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⁸ FCC, Structure and Practices of the Video Relay Services Program, 82 FR 19347 (Apr. 27, 2017).