

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of	)	
	)	
Telecommunications Relay Services and Speech-	)	CG Docket No. 03-123
to-Speech Services for Individuals with Hearing	)	
and Speech Disabilities	)	
	)	
Structure and Practices of the Video Relay Service	)	CG Docket No. 10-51

Adopted: September 29, 2025**Released: September 29, 2025**

ORDER

By the Chief, Consumer and Governmental Affairs Bureau:

I. INTRODUCTION

1. The Consumer and Governmental Affairs Bureau (CGB or Bureau) partially waives the Commission's rule prohibiting video relay service (VRS) calls from locations outside of the United States to locations in the United States unless the user, prior to leaving the country, notifies their VRS provider of their travel details.¹ Because numerous VRS users are expected to travel to Tokyo, Japan, this fall for the Deaflympics Games, the waiver is in the public interest. For the reasons explained below, we partially waive section 64.604(d)(6) of the Commission's rules to facilitate VRS international calls during the time period of this event. This waiver shall be in effect from November 1, 2025, through December 10, 2025.

II. BACKGROUND

2. *The Deaflympics.* The Deaflympics is an international athletic event sanctioned by the International Olympic Committee at which deaf athletes representing their countries compete at an elite level. The Games, held every four years, will be held this year in Tokyo from November 15-26, 2025.² Since 1935, U.S. athletes have won over 1,000 medals at the Deaflympics—the most among participating nations.³ The United States was represented by 137 athletes at the 2022 Summer Deaflympics in Brazil,⁴ which was attended by more than 5,000 fans.⁵

3. *International VRS Calling.* We anticipate that VRS users will travel to Japan to participate in, and observe, the Deaflympics Games and will want to make calls to the United States while abroad. Under the current rules, a VRS user must notify their default VRS provider, prior to departure

¹ 47 C.F.R. § 64.604(d)(6). VRS, a form of telecommunications relay service (TRS), “allows people with hearing or speech disabilities who use sign language to communicate with voice telephone users through video equipment.” 47 CFR § 64.601(a)(57). The VRS user signs to a communications assistant (CA) who voices the conversation to the telephone user and then signs the conversation back to the VRS user.

² See Tokyo 2025 Deaflympics, <https://deaflympics2025-games.jp/en/#gsc.tab=0> (last visited Sept. 9, 2025).

³ See 2025 International Committee of Sports for the Deaf, <https://www.deaflympics.com/icsd>.

⁴ See Deaflympics, Caxias do Sul, United States of America, <https://www.deaflympics.com/games/caxias-do-sul-2022/USA> (last visited Sept. 15, 2025).

⁵ See Deaflympics, Closing Ceremony, ICSD President's speech, <https://www.deaflympics.com/news/closing-ceremony-icsd-presidents-speech> (last visited Sept. 15, 2025).

from the United States, specifying the locations to which the individual will be traveling and a specified time period during which the user will be on international travel.⁶ Only calls made from those locations and during the specified time period are compensable from the TRS Fund, if otherwise in compliance with the Commission's rules.⁷

4. In practice, VRS users frequently do not notify their provider regarding international calling prior to their departure from the United States. When such a user attempts to make a call from abroad to the United States, the VRS provider will not connect the call and refers the user to the Commission's Disability Rights Office (DRO) to obtain a waiver of the pre-departure notification requirement. DRO must, in turn, collect the required travel information from the user, review the request, and, if approved, issue a letter decision for the user to send to the VRS provider. Although the pre-departure notification process has been in place for 15 years,⁸ many VRS users either forget or are not aware of the requirement to notify their provider prior to departure from the United States.

5. Recently, following the implementation of the TRS User Registration Database (User Database)⁹ and other anti-fraud measures, the Commission has rescinded the requirement for VRS users to notify their default provider before departure from the United States.¹⁰ Pursuant to the revised rule, VRS users need only notify their provider of their travel plans before making their first compensable call from an international endpoint.¹¹ However, because the revised rule has not yet completed Paperwork Reduction Act review, it is not yet effective.

III. DISCUSSION

6. *Waiver Standard.* A Commission rule may be waived for "good cause shown."¹² Waiver is appropriate where the particular facts would make strict compliance inconsistent with the public

⁶ 47 CFR § 64.604(d)(6). The Commission adopted a general prohibition on international VRS calls in 2011 to address fraud in the VRS program, including international calls by persons unknown. *See Structure and Practices of the Video Relay Service Program*, CG Docket No. 10-51, Report and Order and Further Notice of Proposed Rulemaking, 26 FCC Rcd 5545, 5564, para. 32 (2011) (*2011 VRS Reform Order*). At the same time, the Commission adopted the limited exception now in section 64.604(d)(6) for users who notified their VRS provider prior to departure from the United States. *See id.*

⁷ The costs for VRS calls are supported entirely by the Interstate TRS Fund, rather than by users. *See* 47 U.S.C. § 225(d)(3)(B) (costs of intrastate relay calls are borne by the states; costs for interstate TRS calls are funded by subscribers to interstate telephone services). VRS providers are compensated for the provision of the service in accordance with the Commission's rules and orders. *See* 47 CFR § 64.604(c)(5)(iii)(D)-(E).

⁸ *See 2011 VRS Reform Order*, 26 FCC Rcd at 5564, para. 32.

⁹ The User Database verifies the registration information of each VRS user. *See Video Relay Service Providers May Begin Submitting Data to the TRS User Registration Database*, CG Docket Nos. 10-51 and 03-123, Public Notice, 32 FCC Rcd 10467 (OMD CGB 2017); *Structure and Practices of the Video Relay Service Program*, CG Docket No. 10-51, Report and Order, 28 FCC Rcd 8618, 8649-53, paras. 68-77 (2013) (*2013 VRS Reform Order*); 47 CFR § 64.611(a)(4) (TRS-URD data requirements).

¹⁰ *See Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities; Structure and Practices of the Video Relay Service Program; Petition for Rulemaking and Interim Waiver of Convo Communications, LLC*, CG Docket Nos. 03-123 and 10-51, 38 FCC Rcd 12750, 12763, paras. 32-33 (2023) (*2023 VRS Improvements Order*).

¹¹ *See id.* at 12763, para. 32.

¹² 47 CFR § 1.3; *see also* *ICO Global Communications (Holdings) Limited v. FCC*, 428 F.3d 264 (D.C. Cir. 2005); *Northeast Cellular Telephone Co. v. FCC*, 897 F.2d 1164 (D.C. Cir. 1990); *WAIT Radio v. FCC*, 418 F.2d 1153 (D.C. Cir. 1969).

interest. Good cause for a waiver may be found if special circumstances warrant a deviation from the general rule and such deviation will serve the public interest.¹³

7. We find that a partial waiver of section 64.604(d)(6) is appropriate because special circumstances warrant a deviation from the general rule, and such deviation will serve the public interest. International travel associated with attending the Deaflympics is a special circumstance that will burden an unusually large number of VRS users making international calls during a short span of time, and will require significant resources from VRS providers and the Commission to address. Under these special circumstances, partially waiving section 64.604(d)(6) will reduce the burdens imposed on VRS users, providers, and the Commission by ensuring that VRS users traveling abroad will not have their access to VRS impeded during the period of time surrounding the Deaflympics Games.

8. First, by not requiring VRS users to notify their provider *before* they leave the United States, the waiver will facilitate the users' ability to make calls to the United States by simply notifying their provider before making their first international call, even if they have already departed the United States. Second, the waiver eliminates the need for VRS providers to require users to obtain individual waivers from DRO. This ameliorates the inevitable delay for those users in making international calls while DRO collects the required information from the user, prepares and issues a letter decision, and sends the decision to the user, so the user can send the decision to the VRS provider. As the Commission found when it revised section 64.604(d)(6), this procedure better aligns with functional equivalency for VRS users and reduces administrative costs incurred by VRS providers, the TRS Fund administrator, and Commission staff to enforce the pre-departure notification requirement.¹⁴

9. Finally, we determine that granting this limited waiver will not lead to a significant risk of fraud, abuse, or waste of the TRS Fund. As noted above, the Commission has amended the pre-departure notice requirement to allow such notice at any time prior to making an international call. A waiver is needed only because this amendment has not yet become effective. As the Commission found when it amended the rule, the User Database registration requirement, which includes vetting of each new VRS user by the User Database administrator, provides sufficient assurance against payment of compensation for fraudulent VRS calls, including calls from unknown persons located outside the United States.¹⁵

10. Accordingly, we find good cause to waive the pre-departure notification requirement of section 64.604(d)(6). We will allow VRS users traveling abroad to notify their VRS providers at any time before they make their first international call. This waiver shall be in effect from November 1, 2025, through December 10, 2025, two weeks before and two weeks after the Deaflympics Games.

11. Pursuant to this waiver, VRS providers may be compensated for calls to the United States from VRS users on international travel for the duration of the user's travel, as long as they are notified of such travel prior to the user placing an international call within the waiver period specified in this Order. VRS users will still have to specify the locations to which they will be traveling, as well as a finite time period during which they will be on travel.

12. We do not restrict the waiver to users traveling only to Japan during the waiver period. Such a geographic limitation on the waiver would create burdens for VRS providers by requiring them to evaluate whether a user's travel plans qualify the user for post-departure notification. VRS providers would have to keep track of VRS users who visit Japan and then travel to another international point to distinguish them from VRS users who did not travel to Japan and refer the latter users to DRO for a separate waiver. This would impose unnecessary administrative burdens on providers, users, and Commission staff responsible for ruling on requests for waivers on a user-by-user basis. Further, the

¹³ *Northeast Cellular*, 897 F.2d at 1166; *see also ICO Global Communications*, 428 F.3d at 269 (quoting *Northeast Cellular*).

¹⁴ *See 2023 VRS Improvements Order*, 38 FCC Rcd at 12763, para. 33.

¹⁵ *See id.* at 12763-64, para. 34.

Commission has already decided that VRS users traveling abroad should be allowed to place international calls by notifying their VRS provider post-departure.¹⁶ Accordingly, we find that waiving the notification requirement for VRS users traveling abroad during the period the waiver is in effect will best serve the public interest for VRS users, VRS providers, and Commission staff.

IV. PROCEDURAL MATTERS

13. *People with Disabilities.* To request materials in accessible formats for people with disabilities (Braille, large print, electronic files, audio format), send an e-mail to fcc504@fcc.gov or call the Consumer and Governmental Affairs Bureau at 202-418-0530.

14. *Additional Information.* For additional information on this proceeding, contact William Wallace, Disability Rights Office, Consumer and Governmental Affairs Bureau, at 202-418-2716, or William.Wallace@fcc.gov.

V. ORDERING CLAUSES

15. Accordingly, IT IS ORDERED that, pursuant to sections 1, 2, 3, and 225 of the Communications Act of 1934, as amended, 47 U.S.C. §§ 151, 152, 153, and 225, the foregoing ORDER IS ADOPTED.

16. IT IS FURTHER ORDERED that, pursuant to sections 1, 2, 4(i), 4(j), and 225 of the Communications Act of 1934, as amended, 47 U.S.C. §§ 151, 152, 154(i), 154(j), and 225, and section 1.3 of the Commission's Rules, 47 CFR § 1.3, the pre-U.S.-departure requirement for Video Relay Service users to notify their default provider prior to making international calls in section 64.604(d)(6), 47 CFR § 64.604(d)(6), is TEMPORARILY WAIVED as set forth in the Order, from November 1, 2025, through December 10, 2025.

17. IT IS FURTHER ORDERED that, pursuant to sections 1.4(b) and 1.103(a) of the Commission's rules, 47 CFR §§ 1.4(b) and 1.103(a), this ORDER SHALL BE EFFECTIVE upon release.

FEDERAL COMMUNICATIONS COMMISSION

Eduard Bartholme III
Chief
Consumer and Governmental Affairs Bureau

¹⁶ See *supra* para. 5.