



# PUBLIC NOTICE

**Federal Communications Commission**  
**45 L Street NE**  
**Washington, DC 20554**

News Media Information 202-418-0500  
Internet: [www.fcc.gov](http://www.fcc.gov)

**DA 25-949**

**Released: November 18, 2025**

## **COMMENT SOUGHT ON REQUEST FOR WAIVER FOR COMPLETING DEMAND DATA IN TELECOMMUNICATIONS RELAY SERVICE DATA REQUESTS**

**CG Docket No. 03-123**

**Comments Due: December 3, 2025**

**Reply Comments Due: December 15, 2025**

The Consumer and Governmental Affairs Bureau (Bureau) seeks comment on a Request for Waiver filed by Global Caption, Inc., regarding completion of the historical and projected demand data associated with the Annual Interstate Telecommunications Relay Services Data Requests (RSDRs).<sup>1</sup> The Commission granted Global Caption conditional certification to provide Interstate Protocol Captioned Telephone Service (IP CTS) in carceral facilities on January 4, 2024.<sup>2</sup> Global Caption states that it began providing service on January 1, 2025.<sup>3</sup>

Telecommunications relay service (TRS) providers are required to provide the Interstate TRS Fund administrator “with true and adequate data, and other historical, projected and state rate related information reasonably requested to determine the TRS Fund revenue requirements and payments.”<sup>4</sup> Included in the annual RSDRs is a request for two years of historical and two years of projected demand data.<sup>5</sup> Global Caption seeks a waiver of the requirement to respond to the RSDR that were due in 2024 and 2025. Global Caption states that as a new entrant and having deployed services to carceral locations just since January 1, 2025, it does not have information sufficient to provide meaningful and useful data to submit to the TRS Fund administrator for use in determining the TRS Fund revenue requirements and payments. Global Caption asserts that good cause exists to waive this requirement because the inclusion of projections before it has a better understanding of the costs and patterns of demand within carceral locations would have frustrated the Commission’s purpose of establishing TRS Fund revenue requirements and payments for the prior and current TRS Fund year.

*Filing Requirements.* Interested parties may file comments and reply comments on or before the dates indicated above. All filings must reference CG Docket Nos. 03-123. Comments may be filed using the Commission’s Electronic Comment Filing System (ECFS).

- Electronic Filers: Comments may be filed electronically using the Internet by accessing the ECFS: <https://www.fcc.gov/ecfs/>.

---

<sup>1</sup> Global Caption, Inc. – Request for Waiver of Relay Service Data Requests, CG Docket No. 03-123 (filed July 23, 2025) (Waiver Request), <https://www.fcc.gov/ecfs/document/10723478225728/1>.

<sup>2</sup> See *Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities*, CG Docket No. 03-123, Order, 39 FCC Rcd 82 (CGB 2024).

<sup>3</sup> Waiver Request at 2.

<sup>4</sup> 47 CFR § 64.604(c)(5)(iii)(D)(I).

<sup>5</sup> See Rolka Loube, Interstate TRS Fund Annual Provider Data Request: Filing Instructions, at 6 (2025) (OMB Control Number 3060-0463) (“For all IP-based TRS, using the Demand worksheet, the provider must report the most recent two years’ historical...compensated demand and two years of projected...compensable demand.”).

- Paper Filers: Parties who choose to file by paper must file an original and one copy of each filing.
  - Filings can be sent by hand or messenger delivery, by commercial courier, or by the U.S. Postal Service. All filings must be addressed to the Secretary, Federal Communications Commission.
  - Hand-delivered or messenger-delivered paper filings for the Commission's Secretary are accepted between 8:00 a.m. and 4:00 p.m. by the FCC's mailing contractor at 9050 Junction Drive, Annapolis Junction, MD 20701. All hand deliveries must be held together with rubber bands or fasteners. Any envelopes and boxes must be disposed of before entering the building.
  - Commercial courier deliveries (any deliveries not by the U.S. Postal Service) must be sent to 9050 Junction Drive, Annapolis Junction, MD 20701.
  - Filings sent by U.S. Postal Service First-Class Mail, Priority Mail and Priority Mail Express must be sent to 45 L Street, NE, Washington, DC 20554.

*Ex Parte Rules.* The proceeding this Public Notice initiates shall be treated as a "permit-but-disclose" proceeding in accordance with the Commission's *ex parte* rules.<sup>6</sup> Persons making *ex parte* presentations must file a copy of any written presentation or a memorandum summarizing any oral presentation within two business days after the presentation (unless a different deadline applicable to the Sunshine period applies). Persons making oral *ex parte* presentations are reminded that memoranda summarizing the presentation must (1) list all persons attending or otherwise participating in the meeting at which the *ex parte* presentation was made, and (2) summarize all data presented and arguments made during the presentation. If the presentation consisted in whole or in part of the presentation of data or arguments already reflected in the presenter's written comments, memoranda or other filings in the proceeding, the presenter may provide citations to such data or arguments in his or her prior comments, memoranda, or other filings (specifying the relevant page and/or paragraph numbers where such data or arguments can be found) in lieu of summarizing them in the memorandum. Documents shown or given to Commission staff during *ex parte* meetings are deemed to be written *ex parte* presentations and must be filed consistent with rule 1.1206(b). In proceedings governed by rule 1.49(f) or for which the Commission has made available a method of electronic filing, written *ex parte* presentations and memoranda summarizing oral *ex parte* presentations, and all attachments thereto, must be filed through the electronic comment filing system available for that proceeding, and must be filed in their native format (e.g., .doc, .xml, .ppt, searchable .pdf). Participants in this proceeding should familiarize themselves with the Commission's *ex parte* rules.

*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](mailto:fcc504@fcc.gov) or call the Bureau at 202-418-0530 (voice).

*Additional Information.* For further information regarding this Notice, please contact William Wallace, Disability Rights Office, Consumer and Governmental Affairs Bureau, at 202-418-2716, or by e-mail to [William.Wallace@fcc.gov](mailto:William.Wallace@fcc.gov).

– FCC –

---

<sup>6</sup> 47 CFR §§ 1.1200 *et seq.*