



Federal Communications Commission  
Washington, D.C. 20554

April 2, 2015

To InnoCaption Users:

On April 2, 2015, InnoCaption, Inc., a provider of Internet Protocol Captioned Telephone Service (IP CTS) announced that it will be temporarily suspending its service because it is not in compliance with Federal Communication Commission (FCC) 911 emergency call handling rules. The failure to handle these calls means that the FCC also must suspend InnoCaption's certification to provide IP CTS, until it comes into 911 compliance. By this letter, I am writing to explain why the suspension of InnoCaption's service is necessary.

The Americans with Disabilities Act requires the FCC to ensure the provision of telecommunications relay services that are functionally equivalent to voice telephone services. Access to 911 services is an essential component of functional equivalency. Because the ability to effectively place a 911 call can mean the difference between life and death, relay users (including IP CTS users) must have the same capability as hearing telephone users to place emergency calls and receive callbacks from emergency services if an emergency call is disconnected.

In order to ensure effective 911 access, FCC rules require IP CTS providers to accept 911 calls and route such calls to the appropriate Public Safety Answering Point (PSAP) or other appropriate 911 emergency center serving a 911 caller's location. In addition, at the beginning of a 911 call, IP CTS providers must convey certain information that will allow the 911 emergency center to re-establish contact with the Communications Assistant (CA) – and thereby the relay user – if the call is disconnected. This is to ensure that the caller continues to have contact with the 911 emergency center operator.

Tests performed by the FCC over the past several months indicate that InnoCaption's service does not comply with the above emergency call handling rules. InnoCaption's inability to handle 911 emergency calls in compliance with FCC rules could have serious consequences for the lives, health, and safety of InnoCaption users. As a consequence, it is necessary to suspend InnoCaption's service until it is capable of handling 911 emergency calls in full compliance with all FCC requirements.

We understand that some consumers rely on InnoCaption to communicate over the telephone in their personal and professional lives. We want to assure you that it remains the FCC's goal to ensure that all people who are deaf, hard of hearing, deaf-blind or speech disabled have the communication access needed to fully participate in all aspects of society. For this reason, we are working with InnoCaption to expedite its compliance with FCC 911 emergency call handling rules so that it can resume service for the community. Please note that several other companies offer IP-CTS that you may want to consider using. You can find a full list of Internet-based relay providers at <http://www.fcc.gov/encyclopedia/trs-providers>. If you have any questions about this temporary service interruption, please contact the FCC Disability Rights Office at 202-418-2517 or [dro@fcc.gov](mailto:dro@fcc.gov). We appreciate your patience and look forward to InnoCaption developing a functionally equivalent service that includes compliant 911 emergency calling service.

Sincerely,

Kris Anne Monteith  
Acting Chief  
Consumer and Governmental Affairs Bureau