



OFFICE OF  
THE CHAIRMAN

FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON

June 12, 2020

The Honorable Jerry Moran  
United States Senate  
521 Dirksen Senate Office Building  
Washington, DC 20510

Dear Senator Moran:

Thank you for your letter regarding Internet Protocol Captioned Telephone Service (IP CTS). IP CTS is a critical service for people with hearing loss, and I agree that consumers must receive high quality, reliable service. That is why the Commission under my leadership has been focused on maintaining necessary service standards and facilitating technological innovation which can both improve service and reduce costs.

The FCC has examined whether providers can offer this vital service in new ways, consistent with the Commission's Telecommunications Relay Services (TRS) standards and its responsibility to encourage innovation in technology for consumers who depend on these services. The Commission determined that providers using only Automatic Speech Recognition (ASR) technology can meet those core obligations. The Commission further determined that ASR-only IP CTS can offer improvements in speed, accuracy, reliability, and privacy for consumers and can reduce the current cost burden on TRS Fund contributors.

Like other IP CTS providers, ASR-only providers must comply with the Commission's minimum standards for all forms of TRS, including requirements for confidentiality, verbatim transcription, speed-of-answer, and redundancy. Importantly, as with all forms of IP CTS, providers using ASR must demonstrate that their services support 911 emergency calls and meet the applicable emergency call handling requirements in Commission rules. Notably, most IP CTS providers have relied on ASR for years to provide service to users. However, those providers insert a communications assistant—*i.e.*, a person—between the caller and the ASR, requiring the communications assistant to revoice whatever the caller is saying. This substantially slows down transcription speed and reduces the privacy of users.

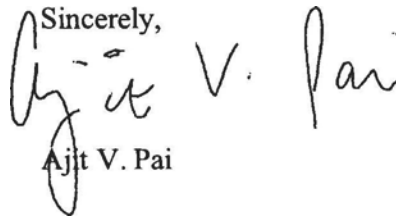
Whether the Commission should adopt more detailed service quality standards that all IP CTS providers must meet is still under consideration. The Commission has an open *Notice of Inquiry* seeking comment on potential quantitative service measurements and standards and is actively considering comments filed in that proceeding. Additionally, the FCC's Consumer and Governmental Affairs Bureau sought comment on individual applications to provide ASR-only IP CTS to determine whether they meet the Commission's stringent certification requirements.

After careful consideration of the record, the Bureau recently granted conditional certifications to two applicants for ASR-only IP CTS service. I have enclosed copies of those decisions, which include detailed analyses of those applications and performance testing of each

applicant's technology conducted by the Commission's contractor, MITRE Corporation. The decisions also make it clear that because ASR-only IP CTS is a new method for the provision of this service, these conditional certifications will allow the FCC to confirm through observing their actual service to registered users that the providers are meeting or exceeding the Commission's minimum TRS standards.

Finally, our decision to allow conditional certification of ASR-only service does not mean that consumers are required to use those types of services. Consumers continue to be able to choose among multiple providers based on the quality of service and the methods the provider offers, including services that use communications assistants.

Please let me know if I can be of any further assistance.

Sincerely,  
  
Ajit V. Pai

Enclosures



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OFFICE OF  
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June 12, 2020

The Honorable Jon Tester  
United States Senate  
311 Hart Senate Office Building  
Washington, DC 20510

Dear Senator Tester:

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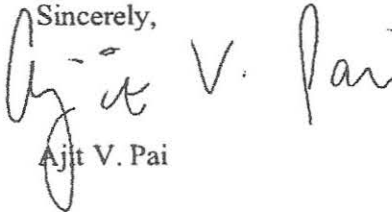
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