

Recordkeeping Compliance Certification and Contact Information (RCCCI) Filing Instructions

The Federal Communications Commission (FCC or Commission) requires service providers and equipment manufacturers that are subject to Section 255, 716, or 718 of the Communications Act to maintain records of the efforts they take to implement these accessibility requirements.

Each year by April 1, covered entities must file their annual recordkeeping certifications and required contact information in the “Recordkeeping Compliance Certification and Contact Information Registry” (RCCCI Registry) at <https://apps.fcc.gov/rccci-registry/>.¹ Covered entities must file three pieces of information in the RCCCI:

- (1) certification of their annual recordkeeping;
- (2) their current contact information for consumers; and
- (3) their current U.S. agent for service contact information.²

Recordkeeping Requirements

Entities subject to Sections 255, 716, and 718 are required to maintain, in the ordinary course of business and for a reasonable period, records of the efforts they have taken to implement Sections 255, 716, and 718, including:

- information about the manufacturer's or provider's efforts to consult with individuals with disabilities;
- descriptions of the accessibility features of its products and services; and
- information about the compatibility of such products and services with peripheral devices or specialized customer premise equipment commonly used by individuals with disabilities to achieve access.³

RCCCI Reporting Requirements

By April 1 of each year, an officer of each entity subject to Section 255, 716, or 718 must submit to the Commission a certification that records are being kept in accordance with the Communications Act.⁴ The certificate must state that the manufacturer or service provider, as applicable, has established operating procedures that are adequate to ensure compliance with the recordkeeping rules and that it is keeping records accordingly.⁵ Certification must be made in the online registry at <https://apps.fcc.gov/rccci-registry/>.

The certificate must also identify the name and contact details of the person (or persons) within the company who is authorized to resolve complaints⁶ and the agent designated for service of informal and

¹ 47 U.S.C. § 618; *see also* 47 CFR § 14.31(b).

² All three items must be properly filed to comply with 47 CFR § 14.31(b).

³ 47 U.S.C. § 618(a)(5)(A); *see also* 47 CFR §§ 14.30(b), 14.31(a).

⁴ 47 U.S.C. § 618(a)(5)(B); *see also* 47 CFR § 14.31(b).

⁵ 47 CFR § 14.31(b)(1).

⁶ The Commission makes the contact information for the person(s) within the company available on the

formal complaints alleging violations of Sections 255, 716, and 718 of the Communications Act or the Commission's accessibility rules.⁷ Contact information shall include, for the manufacturer or the service provider, a name or department designation, business address, telephone number, and, if available, TTY number, facsimile number, and e-mail address.⁸ Contact information must be filed in the online registry, and the certificate must be updated within 30 days of any change.⁹

RCCCI Registry

To submit a recordkeeping certification or to enter or update contact information in compliance with the Commission's rules, go to <https://apps.fcc.gov/rccci-registry/>. Follow the instructions provided on the website for submitting certifications and contact information.

FREQUENTLY ASKED QUESTIONS

Where can I find the accessibility recordkeeping and contact information reporting rules?

The recordkeeping and contact information reporting rules are found at www.ecfr.gov/current/title-47/chapter-I/subchapter-A/part-14/subpart-D/section-14.31.

Who is required to file?

Any entity that is subject to Section 255, 716, or 718 of the Communications Act must submit its recordkeeping compliance certification and contact information annually and update that information as needed.

Section 255 and the Commission's implementing rules apply to:

- (a) any provider of telecommunications, interconnected VoIP, voicemail, or interactive menu service;
- (b) any manufacturer of telecommunications or interconnected VoIP equipment or customer premises equipment; and

Commission's website at <http://apps.fcc.gov/rccci-search/search.action> to facilitate consumers' ability to communicate directly with equipment manufacturers and service providers about accessibility issues or concerns. This information will also be used by the Commission to contact a company to facilitate resolution of an accessibility issue when a consumer files a request for dispute assistance with the Commission. The Commission also encourages covered entities to clearly and prominently identify their points of contact for accessibility matters in, among other places, their company websites, directories, manuals, brochures, and other promotional materials.

⁷ 47 CFR § 14.31(b)(2). This contact information will be used by the Commission's Enforcement Bureau to serve informal and formal complaints. Contact information for designated agents for entities subject to Section 255, along with recordkeeping certifications and other contact information requirements, must also be filed in accordance with 47 CFR § 14.31(b) by using the web-based RCCCI Registry.

⁸ 47 CFR § 14.31(b)(2).

⁹ 47 CFR § 14.31(b)(3). Whenever the information is no longer correct in any material respect, equipment manufacturers and service providers must update the information within 30 days of any change to the information on file with the Commission. *ACS Report and Order*, 26 FCC Rcd at 14667, n.686. Because, as discussed above, the information will be used by the Commission for purposes of facilitating resolution of accessibility issues and notifying the manufacturer or service provider of complaints, we encourage such entities to update the information as soon as possible to minimize the risk of misdirected service, which could shorten the period of time that such company has to respond.

- (c) any telecommunications carrier.¹⁰

Section 716 and the Commission's implementing rules apply to the following, with some exceptions:

- (a) any manufacturer of equipment used for advanced communications services,¹¹ including end user equipment, network equipment, and software, that such manufacturer offers for sale or otherwise distributes in interstate commerce;¹² and
- (b) any provider of advanced communications services that such provider offers in or affecting interstate commerce.¹³

Section 716 and the Commission's implementing rules do not apply:

- (a) to the extent an entity transmits, routes, or stores the communications made available by a third party, or provides an information location tool through which an end user obtains access to advanced communications services, except to the extent an entity relies on third party solutions to comply with these rules;¹⁴
- (b) to any equipment or services, including interconnected VoIP service, that were subject to the requirements of Section 255 of the Communications Act on October 7, 2010;¹⁵
- (c) to customized equipment and services;¹⁶ and
- (d) to multipurpose services or equipment that are subject to waivers granted by the Commission.¹⁷

Section 718 applies to:

- (a) manufacturers of telephones used with public mobile services that include an Internet browser in such telephone; and
- (b) providers of mobile service that arrange for the inclusion of a browser in telephones to sell to customers.¹⁸

When are companies required to file the recordkeeping compliance certification and contact information?

Covered entities must submit their recordkeeping compliance certification and required contact information with the Commission every year by April 1.

¹⁰ See 47 CFR §§ 6.1, 7.1.

¹¹ "Advanced communications services" means interconnected VoIP service, non-interconnected VoIP service, electronic messaging service, and interoperable video conferencing service. 47 U.S.C. § 153(1); 47 CFR § 14.10(c).

¹² 47 U.S.C. § 617(a)(1); 47 CFR § 14.1(a).

¹³ 47 U.S.C. § 617(b)(1); 47 CFR § 14.1(b).

¹⁴ 47 CFR §§ 14.2(a), (b).

¹⁵ 47 CFR § 14.2(c).

¹⁶ 47 CFR § 14.3.

¹⁷ 47 CFR § 14.5.

¹⁸ 47 U.S.C. § 619(a).

Covered entities must update the required contact information on file with the Commission within 30 days of any material change to keep that information current.¹⁹ When the entity files its annual recordkeeping certification, it should update its contact and service information, if necessary.

How do I file the recordkeeping compliance certification and contact information?

Use the web-based Recordkeeping Compliance Certification and Contact Information Registry (RCCCI Registry) by going to <https://apps.fcc.gov/rccci-registry/>. There, you will find more information about the RCCCI Registry filing requirements: (1) a recordkeeping compliance certification; (2) contact information for consumers; and (3) U.S. agent for service contact information.

You will need an FCC Registration Number (FRN) and password to log in to the RCCCI Registry. The login screen has links to help you determine whether your company has been assigned an FRN, to register with the FCC if you need an FRN, and to contact tech support if you forgot your FRN password.

New Filers:

When you log into the RCCCI Registry, you will see instructions for viewing, editing, and deleting existing records, and for entering new records.

Click on the “**New Recordkeeping Compliance Certificate**” tab at the top of the screen. Enter your company name, select your company type(s) (optional), select the time period covered by the recordkeeping compliance certification, select and complete the appropriate declaration, and enter the contact information of the declarant. Submit the completed certification.

Click on the “**New Contact Information for Consumers**” tab at the top of the screen. Enter your company name, select your company type(s) (optional), and enter the contact information of the person authorized to resolve accessibility problems. You may also enter your name, job title, and e-mail address (“submitter information”) to receive a filing confirmation by e-mail. Submit the contact information.

Click on the “**New U.S. Agent for Service Contact Information**” tab at the top of the screen. Enter your company name, select your company type(s) (optional), and enter the contact information for the U.S. agent designated for service of complaints. You may also enter your name, job title, and e-mail address (“submitter information”) to receive a filing confirmation by e-mail. Submit the contact information.

Click on the “**Records**” tab at the top of the screen. You should now have three records for your company (a recordkeeping compliance certification, contact information for consumers, and U.S. agent for service contact information). You may want to print a copy of that screen for your records.

Returning Filers:

When you log into the RCCCI Registry, you will see instructions for viewing, editing, and deleting existing records, and for entering new records.

You will also see a “summary view” of all of the records submitted under your FRN.

¹⁹ 47 CFR § 14.31(b)(3).

Click on the reference number next to your “Contact Information for Consumers” record. Review the contact information. If edits are needed, click on “edit” in the upper right corner. To save your changes, click on the “update” button at the bottom of the screen.

Click on the “**Records**” tab at the top of the screen. Click on the reference number next to your “U.S. Agent for Service Contact Information” record. Review the contact information. If edits are needed, click on “edit” in the upper right corner. To save your changes, click on the “update” button at the bottom of the screen.

Click on the “**New Recordkeeping Compliance Certificate**” tab at the top of the screen. Enter your company name, select your company type(s) (optional), select the time period covered by the recordkeeping compliance certification, select and complete the appropriate declaration, and enter the contact information of the declarant. Submit the completed certification.

Click on the “**Records**” tab at the top of the screen. You should now have multiple records for your company (recordkeeping compliance certifications covering multiple time periods, contact information for consumers, and U.S. agent for service contact information). You may want to print a copy of that screen for your records.

Do I need to complete, submit, and maintain all three pieces of information in the RCCCI Registry?

Yes. Your certification is not complete unless you submit all three pieces of information. To comply with the Commission’s rule, you must complete, submit, and maintain:

- (1) annual recordkeeping compliance certification;
- (2) current contact information for consumers; and
- (3) current U.S. agent for service contact information.

Do I need to submit new contact information records every year?

No. New recordkeeping certifications must be filed every year. *However, new contact information records do not need to be filed every year.* Instead, once filed, contact information records (for consumers and for the U.S. agent for service) must be edited and updated within 30 days of any material change. The filing of the annual recordkeeping certification provides a natural opportunity to ensure that contact information records have been appropriately updated.

Do I need to prepare a separate document containing my company’s certification and contact information for electronic filing in the RCCCI Registry?

No. When you go to the online RCCCI Registry, it will ask you to certify and enter your contact information, so no separate documents or attachments are necessary to satisfy the requirements of 47 CFR § 14.31(b).

Does our U.S. agent for service need to be an attorney?

No. Your agent for service of informal and formal complaints filed under Sections 255, 716, or 718 of the Communications Act must be located within the U.S., but may be your registered agent, an in-house or outside attorney, or a responsible person who is a non-attorney, including a designated company employee or the same person who you have designated to receive complaints directly from customers.

Why is filing important?

Failure to file a certification and failure to keep information current is a violation of the Commission's rules and may subject the filer to forfeiture or other penalties. In addition, if an informal complaint is not served to the correct address, it could delay or prevent the applicable manufacturer or service provider from timely responding. Failure to respond to a complaint or order of the Commission may subject a party to sanctions or other penalties.

What if I have questions or need assistance?

For further information, contact Darryl Cooper, Disability Rights Office, CGB, at 202-418-7131 or by e mail to Darryl.Cooper@fcc.gov.