

**STATEMENT OF  
CHAIRWOMAN JESSICA ROSENWORCEL**

Re: *Internet Protocol Captioned Telephone Service Compensation*, CG Docket No. 22-408; *Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities*, CG Docket No. 03-123; *Misuse of Internet Protocol (IP) Captioned Telephone Service*, CG Docket No. 13-24, Notice of Proposed Rulemaking and Order on Reconsideration (December 21, 2022)

At the heart of our responsibilities under the Americans with Disabilities Act lies the concept of functional equivalency. Though it sounds like language only a lawyer could love, for millions of adults with hearing loss, functional equivalency matters. It means they can pick up the phone and seek emergency help, work with colleagues, make a doctor's appointment, follow up with a child's teacher, and connect with family and friends—just like their hearing counterparts.

At the Federal Communications Commission, we give meaning to functional equivalency by ensuring that there are services in the marketplace that assist those with hearing loss use communications. Internet Protocol Captioned Telephone Service, or IP CTS, is one of those services. It allows those with some residual hearing to use their own voice to speak during a call but then read captions on their device when the other participant in the call responds.

As technology has evolved, so has IP CTS. Some providers now use automated speech recognition to provide service instead of traditional IP CTS, which requires human intervention through communications assistants.

In the rulemaking we adopt today, we seek to reflect these changes in a way that honors functional equivalency. First, we recognize that as new technologies emerge we need to ensure that they meet basic service-quality standards and take note of our ongoing work to establish appropriate measures for both forms of IP CTS. Second, we propose to compensate providers differently, depending on when they are providing captions on a fully automated basis or providing them through the use of traditional communications assistants.

I look forward to the record that develops. I also look forward to continuing to support IP CTS in a way that acknowledges technological change and is also consistent with our duties under the Americans with Disabilities Act.

Thank you to those responsible for this effort, including Bob Aldrich, Diane Burstein, Edyael Casaperalta, Eliot Greenwald, Josh Mendelsohn, Ike Ofobike, Alejandro Roark, Michael Scott, Ross Slutsky, and Dana Warrick from the Consumer and Governmental Affairs Bureau; Cara Grayer from the Office of Communications Business Opportunities; Terry Cavanaugh, Richard Mallen, and William Richardson from the Office of General Counsel; Susan Lee, Kim Makuch, Michelle Schaefer, Emily Talaga, and Andrew Wise from the Office of Economics and Analytics; and Soumitra Das and Andrew Mulitz from the Office of the Managing Director.