October 30, 2025

FCC FACT SHEET[*]

Analog TRS Modernization

Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities; Speech-to-Speech and Internet Protocol (IP) Speech-to-Speech Telecommunications Relay Services

Notice of Proposed Rulemaking – CG Docket Nos. 03-123, 08-15

Background: This Notice of Proposed Rulemaking would initiate a proceeding to modernize telecommunications relay services (TRS). Currently, the Commission recognizes six forms of TRS, three "analog" services and three Internet-based services. The three analog forms of TRS are TTY-based Relay Service (TTY Relay), Speech to Speech Relay Service (STS), and Captioned Telephone Service (CTS). The analog forms of TRS are in part overseen by state TRS programs. As communications technologies have evolved, analog relay services have seen declining or minimal usage, while Internet-based forms of TRS continue to advance and communication service providers and equipment manufacturers integrate accessible communications functionalities into their services and devices. Addressing these concerns will help ensure that relay services remain effective, accessible, and sustainable for individuals who are deaf, hard of hearing, deafblind, or have speech disabilities.

What the Notice of Proposed Rulemaking Would Do:

- Seek comment on terminating the mandatory status of TTY Relay for state-based TRS programs to afford states the flexibility to adapt their programs to local needs and technological realities.
- Seek comment on how TTY Relay users can be transitioned to modern alternatives.
- Propose to recognize Internet Protocol (IP) STS as a compensable form of TRS that would include video-assisted STS as an integrated or add-on component.
- Seek comment on the application of certification, mandatory minimum standards, and other requirements to the provision of IP STS and effective of STS outreach.
- Seek comment on TRS users requiring additional assistance to transition to IP-based alternatives and how best to provide assistance where it may be needed.
- Seek comment on how state programs may change as analog TRS services transition to IP-based services.
- Seek comment on the need for and whether to establish a temporary national certification process for providers of TTY Relay and STS.
- Seek comment on applying user eligibility, registration, verification, and call detail records requirements to all forms of TRS.
- Propose to delete or modify TRS rules that are obsolete, burdensome, or unnecessary.
- Seek comment on closing CG Docket Nos. 08-15, Speech-to-Speech and Internet Protocol (IP) Speech-to-Speech Telecommunications Relay Services.

[*] This document is being released as part of a "permit-but-disclose" proceeding. Any presentations or views on the subject expressed to the Commission or its staff, including by email, must be filed in CG Docket No. 03-123, which may be accessed via the Electronic Comment Filing System (https://www.fcc.gov/ecfs/). Before filing, participants should familiarize themselves with the Commission's *ex parte* rules, including the general prohibition on presentations (written and oral) on matters listed on the Sunshine Agenda, which is typically released a week prior to the Commission's meeting. See 47 CFR § 1.1200 *et seq*.

Before the
Federal Communications Commission
Washington, D.C. 20554

In the Matter of	)	
	)	
Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities	)	CG Docket No. 03-123
	)	
Speech-to-Speech and Internet Protocol (IP) Speech-to-Speech Telecommunications Relay Services	)	CG Docket No. 08-15

NOTICE OF PROPOSED RULEMAKING*

Adopted: [ ] **Released: [ ]**

Comment Date: [30 days after date of publication in the Federal Register]
Reply Comment Date: [60 days after date of publication in the Federal Register]

By the Commission:

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* This document has been circulated for tentative consideration by the Commission at its November 20, 2025 open meeting. The issues referenced in this document and the Commission's ultimate resolutions of those issues remain under consideration and subject to change. This document does not constitute any official action by the Commission. However, the Chairman has determined that, in the interest of promoting the public's ability to understand the nature and scope of issues under consideration, the public interest would be served by making this document publicly available. The Commission's ex parte rules apply and presentations are subject to "permit-but-disclose" ex parte rules. *See, e.g.*, 47 CFR §§ 1.1206, 1.1200(a). Participants in this proceeding should familiarize themselves with the Commission's ex parte rules, including the general prohibition on presentations (written and oral) on matters listed on the Sunshine Agenda, which is typically released a week prior to the Commission's meeting. *See* 47 CFR §§ 1.1200(a), 1.1203.

I. INTRODUCTION

1. In this Notice of Proposed Rulemaking (Notice), the Federal Communications Commission (Commission) initiates a comprehensive proceeding to modernize telecommunications relay services (TRS).[2] As communications technologies have evolved, analog relay services have seen declining or minimal usage. This Notice seeks to ensure that relay services remain effective, accessible, and sustainable for individuals who are deaf, hard of hearing, deafblind, or have speech disabilities, by proposing a series of reforms to transition users to Internet-based alternatives.

2. We propose to phase out mandatory support for TTY-based relay service (TTY Relay), while facilitating user transitions to Internet-based alternatives like Internet Protocol Relay (IP Relay) or Internet Protocol Captioned Telephone Services (IP CTS). This Notice also explores certifying a national analog relay provider and improving compatibility with real-time text (RTT). Additionally, we propose to streamline TRS provider certification processes, update or eliminate obsolete rules, and close an outdated docket. Through these proposals, the Commission aims to align TRS with today's communications landscape and better serve the needs of relay users.

II. BACKGROUND

A. Analog Telecommunications Relay Services

3. Title IV of the Americans with Disabilities Act of 1990 (ADA), which added section 225 to the Communications Act of 1934, as amended (the Act),[3] directs the Commission to ensure that TRS are available, "to the extent possible and in the most efficient manner," to individuals with hearing or speech disabilities in the United States.[4] The Act defines TRS as "telephone transmission services" that enable such individuals to communicate by wire or radio in a manner "functionally equivalent" to voice communication services.[5]

4. The Act also requires common carriers providing "telephone voice transmission services"

[2] Telecommunications relay services (TRS) are telephone transmission services that provide the ability for an individual who is deaf, hard of hearing, deaf-blind, or who has a speech disability to engage in communication by wire or radio in a manner that is functionally equivalent to communication using voice communication services. 47 U.S.C. § 225(a)(3); 47 CFR § 64.601(a)(48).

[3] 47 U.S.C. § 225.

[4] *Id*. § 225(b)(1).

[5] *Id*. § 225(a)(3).

to "provide in compliance with the regulations" adopted by the Commission TRS throughout the areas in which they offer service.[6] This obligation may be fulfilled individually, through designees, through a competitively selected vendor, or in concert with other carriers.[7] The Act directs the Commission to adopt, administer, and enforce regulations governing the provision of interstate and intrastate TRS.[8] Section 225 also authorizes, but does not require, states to establish their own TRS programs, subject to Commission approval and certification.[9] In states with certified TRS programs, carriers may fulfill their obligation to provide intrastate TRS by participating in the state program.[10] If a state does not have a Commission-certified TRS program, the provision of intrastate TRS in that state falls under the direct supervision of the Commission.[11] Currently, all 50 states, the District of Columbia, and several U.S. territories have FCC-approved TRS programs.[12] State TRS programs primarily provide analog[13] TRS, through contracts with either Hamilton Relay or T-Mobile Accessibility.[14] The analog TRS providers provide the relay services for intrastate, interstate, and international calls. They seek reimbursement for intrastate analog TRS calls from the relevant state program and seek reimbursement for interstate and international calls from the Interstate TRS Fund.[15]

5. The initial form of TRS was a circuit-switched, or "analog" service, which enabled Text Telephone (TTY) users to have telephone conversations with hearing users.[16] Subsequently, the Commission began to recognize new types of relay services, including Internet-based forms of TRS. To speed the development of these services, the Commission determined that, at least initially, state relay programs would not be burdened with the responsibility to fund and supervise the new services.[17]

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[6] *Id*. § 225(c).

[7] *Id*.

[8] *Id*. § 225(d); *see also id*. § 225(b)(2) (providing that, for the purposes of administering and enforcing TRS rules, "the Commission shall have the same authority, power, and functions with respect to common carriers engaged in intrastate communication as the Commission has . . . with respect to any common carrier engaged in interstate communication").

[9] *Id*. § 225(f).

[10] *Id*. § 225(d)(3)(B).

[11] *Id*. § 225(c).

[12] *See Notice of Certification of State and U.S. Territory Telecommunications Relay Services (TRS) Programs*, CG Docket No. 03-123, Public Notice, 38 FCC Rcd 6621 (CGB 2023). No specific funding method is required for intrastate TRS or state TRS programs. States typically recover the costs associated with intrastate TRS through methods like rate adjustments or surcharges on local phone bills.

[13] Analog is an imprecise term that we use to refer to the forms of TRS that do not require an Internet connection to be used.

[14] *See generally* FCC, *TRS by State and Territories*, https://www.fcc.gov/general/trs-state-and-territories (last visited Aug. 18, 2025) (listing each state relay program and the TRS provider the state contracts with for analog relay services).

[15] 47 U.S.C. 225(d)(3)(B) (detailing cost recovery for interstate and intrastate TRS).

[16] A text telephone is a machine that employs graphic communication in the transmission of coded signals through a wire or radio communication system. 47 CFR § 64.601(a)(49).

[17] *See Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities*, CC Docket No. 98-67, Report and Order and Further Notice of Proposed Rulemaking, 15 FCC Rcd 5140, 5153-54, para. 24 (2000) (*2000 TRS Order*); *see also Provision of Improved Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities*; *Petition for Clarification of WorldCom, Inc.*, CC Docket No. 98-67, Declaratory Ruling and Second Further Notice of Proposed Rulemaking, 17 FCC Rcd 7779, 7786, para. 20 (2002) (*2002 IP Relay Declaratory Ruling*).

Therefore, with one exception—Speech-to-Speech relay service (STS)[18]—state TRS programs have not been required to support the new types of TRS.

6. Currently, the Commission recognizes six forms of TRS, three "analog" services and three Internet-based services. The three analog forms of TRS are TTY Relay, STS, and Captioned Telephone Service (CTS). TTY Relay involves an individual with a hearing or speech disability using a TTY machine to communicate through a communications assistant (CA). The CA voices typed messages from the TTY user and types spoken messages from the other party to the call back to the TTY user's machine.[19] STS allows individuals with speech disabilities to communicate through specially trained CAs who understand and repeat their words.[20] CTS is a type of TRS that enables a consumer to speak directly to the other party on a telephone call and, when the other party speaks, to simultaneously both listen to what that party is saying (to the extent possible) and read captions of what the other party is saying.[21] Although state TRS programs do not need to include CTS to receive FCC certification, most state programs currently offer CTS.

7. *Cost Recovery for Analog Services*. Section 225 of the Act provides that, generally, costs attributed to interstate TRS are to be recovered from all subscribers for every interstate service, while costs for intrastate TRS are recovered from the intrastate jurisdiction.[22] Thus, for analog relay services provided through state TRS programs, each state is responsible for determining how to fund the provision of intrastate TRS through the state's TRS program, subject only to the requirement that the method of intrastate cost recovery shall be "consistent with the requirements of" section 225.[23] The interstate costs of analog TRS are recovered through the FCC-administered TRS Fund, and the Commission is responsible for determining how providers of interstate TRS shall be compensated. Since 2007, compensation rates for interstate calls using analog services have been determined by applying the Multi-State Average Rate Structure (MARS) methodology, which does not require a calculation of costs or demand for these specific services.[24]

B. Recent Developments

8. As communications technologies continue to evolve, the TRS landscape is undergoing significant transformations, necessitating a re-evaluation of current rules to ensure continued functional equivalence and efficiency. These developments include a decline in the use of analog relay services, the emergence of advanced Internet-based solutions, and the integration of accessible communications functionalities into smart devices.

9. *Decline in the use of analog relay services*. The transition to Internet Protocol (IP)-based networks is rendering some services, such as traditional TTY Relay and analog CTS, increasingly

[18] *See* 47 CFR § 64.603. Spanish language TTY Relay is also required.

[19] *See 2000 TRS Order*, 15 FCC Rcd at 5152, para. 2; 47 CFR § 64.601(a)(49) (definition of TTY).

[20] 47 CFR § 64.601(a)(46) (definition of STS).

[21] *See Telecommunications Relay Services, and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities*, CC Docket No. 98-67, Declaratory Ruling, 18 FCC Rcd 16121, 16122-23, paras. 3-5 (2003) (*2003 CTS Declaratory Ruling*).

[22] 47 U.S.C. § 225(d)(3)(B).

[23] *Id*.

[24] *See Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities*, CG Docket No. 03-123, Report and Order and Declaratory Ruling, 22 FCC Rcd 20140, 20150-58, paras. 16-38 (2007) (*2007 TRS Cost Recovery Order*).

obsolete.[25] For example, annual interstate TTY Relay minutes declined by 79% from 2002 to 2010.[26] For Fund Year 2025-26, projected interstate TTY Relay minutes are just over 658,000, a significant drop from over 3 million minutes projected in Fund Year 2013-2014.[27] Similarly, aggregated intrastate TTY Relay minutes across ten states declined from over 3 million in 2017 to approximately 1.2 million in 2023.[28] This decline is expected to continue.[29]

10. Analog CTS minutes have also been declining. Use of the service has declined from around 40 million annual minutes in 2011 to 19.9 million in 2017.[30] Currently annual CTS minutes are less than 2.5 million.[31] In Virginia alone, CTS usage declined from approximately 16,000 total annual minutes in 2022 to approximately 5,000 annual minutes in 2024.[32] In Missouri, CTS usage declined from approximately 55,000 annual minutes in 2010 to nearly zero in 2024.[33] Some states, such as Florida, Washington, and Missouri, have dropped analog CTS from their TRS programs.[34]

11. In August 2024, National Association for State Relay Administration (NASRA) members, Gallaudet University, and TDIforAccess (TDI) submitted to the Commission a White Paper asserting that the decline in usage of analog TRS, coupled with the accelerating transition from traditional

[25] *See* Accessibility Advocacy Organizations, "Transition of Legacy Relay Users Reliant on Analog to IP-Based Telephony Relay Solutions: A White Paper," CG Docket No. 03-123, at 5-6 (filed Aug. 12, 2024) (describing the decreasing usage of analog relay services and areas where still in use) (Analog TRS Transition White Paper), https://www.fcc.gov/ecfs/document/10812315813172/1; *see also Direct Video Calling Can Enhance Accessibility of Consumer Call Centers*, CG Docket Nos. 03-123, 10-51, Public Notice, 39 FCC Rcd 13628 , at 13528 (2024) ("With the prevalence of IP-based technology today, the use of TTYs by the deaf and hard of hearing community has declined greatly, and TTY technology is considered antiquated and obsolete.")

[26] 2011 TRS Fund Report, Exh. 3-2 (showing a decline from 30,332,278 minutes in 2002 to 6,442,938 in 2010).

[27] Rolka Loube Salzer Associates LLC, Interstate Telecommunications Relay Services Fund: Payment Formulas and Fund Size Estimate, CG Docket Nos. 03-123 and 10-51, Ex. 2 (May 1, 2013) (2013 TRS Fund Report); Rolka Loube Associates LLC, Interstate Telecommunications Relay Services Fund Report: Payment Formula and Fund Size Estimate, CG Docket Nos. 03-123 and 10-51, Ex. 2 (filed May 6, 2025) (2025 TRS Fund Report), https://www.fcc.gov/ecfs/document/10506166960326/1.

[28] Analog TRS Transition White Paper at 5. Data on intrastate TTY Relay usage is compiled on a state-by-state basis, while interstate TTY Relay usage data is compiled on a nationwide basis.

[29] *See* Missouri Public Service Commission Comments, CG Docket No. 03-123, at 3 (rec. Jan. 17, 2025) (Missouri PSC Comments), https://www.fcc.gov/ecfs/document/1011778956143/1 ("usage for analog relay service has steadily declined"); Accessibility Organizations Reply, CG Docket No. 03-123, at 5 (rec. Feb. 19, 2025) (AO Reply), https://www.fcc.gov/ecfs/document/1021956566595/1 ("[t]he number of legacy relay users continues to decline as more and more people switch to IP-based solutions").

[30] *Misuse of Internet Protocol (IP) Captioned Telephone Service*; *Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities*, CG Docket Nos. 13-24, 03-123, Report and Order, Declaratory Ruling, Further Notice of Proposed Rulemaking, and Notice of Inquiry, 33 FCC Rcd 5800, 5809, para. 17 and Table 1 (2018) (*2018 IP CTS Order and Declaratory Ruling*).

[31] 2025 TRS Fund Report at 10 (reporting 1,834,772.9 intrastate CTS minutes in 2024); 2024 TRS Fund Report, Exh. 2 (projecting 646,709 interstate CTS minutes for Fund Year 2024-25).

[32] Felecia Smith Reply, CG Docket No. 03-123, at 2 (rec. Feb. 19, 2025) (filed on behalf of Virginia Relay), https://www.fcc.gov/ecfs/document/10219058512978/1 (Virginia Relay Comments).

[33] Missouri PSC Comments at 3.

[34] AO Reply at 4. In its comments, Missouri PSC explained that T-Mobile, one of the two providers of analog relay services, informed Missouri that the company will not renew contracts to provide analog CTS and that, as a result, Alabama, Alaska, Arkansas, Delaware, Hawaii, Kansas, New Jersey, South Dakota, and West Virginia will discontinue CTS. Missouri PSC Comments at 2.

analog to IP-based networks,[35] makes it urgent for federal and state policymakers to proactively adapt TRS obligations and programs to reflect the evolution to IP-based networks.[36] In its comments on the White Paper, Missouri PSC highlights its experience with intrastate analog relay service, noting its decline and the need for FCC guidance on related issues.[37] Other commenters share concerns about the availability of vital communication tools for individuals with disabilities, particularly those without broadband or wireless access, during and after the transition from analog to IP-based services.[38] Some commenters likewise emphasize the need for Commission guidance on how states can obtain and use proprietary information to reach out to legacy TTY Relay users and educate them about alternatives, while maintaining user confidentiality.[39]

12. *Emergence of Advanced Internet-based Solutions*. Twenty-five years ago, Internet-based relay services like VRS using specialized videophones were considered cutting-edge technology. VRS was hailed as a significant development, offering functional equivalency for native sign language.[40] Over the past decade there has been widespread adoption of a variety of consumer video conferencing tools, such as FaceTime and Zoom, and the VRS program's growth rate has remained mostly stable.[41]

13. Other advances in technology have created significant opportunities to upgrade and modernize IP-based TRS to expand its reach and improve quality. Developments in Automatic Speech Recognition (ASR) technology, a form of artificial intelligence, are already proving transformative, holding "great promise for a telephone communication experience that may be superior to and more efficient than [CA-assisted] IP CTS."[42] ASR-generated captions for IP CTS are approaching, and in some cases exceeding, the accuracy of human-assisted captioning, while offering advantages in speed, privacy, and significantly lower operating costs.[43] The Commission has certified several IP CTS providers that rely solely on ASR, fostering increased competition and consumer choice,[44] and has implemented

[35] *See Accelerating Wireline Broadband Deployment by Removing Barriers to Infrastructure Investment*, WC Docket No. 17-84, Report and Order, Declaratory Ruling, and Further Notice of Proposed Rulemaking, 32 FCC Rcd 11128, 11141-60, paras. 31-79 (2017) (adopting regulatory reforms to facilitate retirement of copper networks).

[36] Analog TRS Transition White Paper at 1.

[37] Missouri PSC Comments at 1.

[38] AO Reply at 1; CommunicationFirst Comments, CG Docket No. 03-123, at 2 (rec. Jan. 20, 2025), https://www.fcc.gov/ecfs/document/1011844551936/1 (CommunicationFirst Comments); Hamilton Relay, Inc., Reply at 2 (rec. Jan. 17, 2025), https://www.fcc.gov/ecfs/document/10117412921128/1 (Hamilton Comments).

[39] Analog TRS Transition White Paper at 12-13; Missouri PSC Comments at 4.

[40] *See Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities*, CG Docket No. 03-123,CC Docket No. 98-67, Report and Order, 20 FCC Rcd 13165, 13167, para. 3 (2005) ("The advent of VRS as a form of TRS has been one of the most important developments in the short history of TRS. … As a result, VRS calls reflect a degree of 'functionality equivalency' unimaginable in a solely text-based TRS world.").

[41] *See* 2025 TRS Fund Report, Exh. 1-4.a; 2022 TRS Fund Report, Exh. 1-4.a.

[42] *2018 IP CTS Order and Declaratory Ruling*, 33 FCC Rcd at 5807, para. 13; *Misuse of Internet Protocol (IP) Captioned Telephone Service*; *Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities*, CG Docket Nos. 13-24, 03-123, Memorandum Opinion and Order, 35 FCC Rcd 14193, 14206, para. 30 (2020) (*2020 IP CTS Order*).

[43] *2018 IP CTS Order and Declaratory Ruling*, 33 FCC Rcd at 5828-29, paras. 50-51.

[44] *See Misuse of Internet Protocol (IP) Captioned Telephone Service*; *Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities*, CG Docket Nos. 13-24, 03-123, 10-51, Report and Order, Order on Reconsideration, and Further Notice of Proposed Rulemaking, 35 FCC Rcd 10866, 10896, para. 61 (2020) (*2020 IP Metrics Notice*).

differentiated compensation rates for ASR-only and CA-assisted IP CTS.[45] Additionally, the Commission has conditionally approved the use of text-to-speech functionalities for fully automatic IP Relay.[46] Advances in ASR technology are also leading to specialized speech-to-speech technology products that can automatically convert speech that is difficult to understand into more comprehensible speech, paralleling some functions provided by STS.[47]

14. Beyond individual service enhancements, there is a recognized need for greater integration of TRS with modern video conferencing platforms.[48] This includes enabling an integrated audio-visual presence for sign language interpreters in video conferences and exploring how IP Relay and IP CTS could be seamlessly provided within these platforms.[49]

15. Real-Time Text (RTT) allows conversations to take place instantly, transmitting text character-by-character as it is typed, similar to how voice communications are conveyed.[50] RTT is an IP-based technology supporting full duplex operation, seamless integration of voice and text, and a full international character set, with latency equivalent to real-time voice communications.[51] RTT represents a pivotal advancement within IP-based solutions, enabling the immediate, character-by-character transmission of text without requiring a "send" or "enter" command, thereby offering communication functionally equivalent to voice calls.[52] The Commission previously authorized RTT in 2016 as a replacement for TTYs on wireless IP networks, leading to its widespread adoption on modern

[45] *Internet Protocol (IP) Captioned Telephone Service Compensation*; *Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities*; *Misuse of Internet Protocol (IP) Captioned Telephone Service*, CG Docket Nos. 22-408, 03-123, 13-24, Report and Order and Order, 39 FCC Rcd 9099, 9106-07, para. 19 (2024) (*2024 IP CTS Compensation Order*).

[46] *Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities*; *Internet-based TRS Certification Application of Mezmo Corporation to Provide IP Relay Service*, CG Docket No. 03-123, Order, 39 FCC Rcd 13800, 13802, para 8 (2024) (*InnoCaption IP Relay Certification Order*); *Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities*; *TRS Certification Application of Nagish, Inc.*, CG Docket No. 03-123, Order, 39 FCC Rcd 13811, 13814, paras. 9-10 (2024) (*Nagish IP Relay Certification Order*) (conditionally certifying InnoCaption and Nagish, Inc., respectively, for compensation from the Interstate TRS Fund to provide IP Relay on a fully automated basis).

[47] *See, e.g.*, Voiceitt Reply Comments, CG Docket 23-362, at 1-2 (filed Sept. 16, 2024), https://www.fcc.gov/ecfs/document/10916150702896/1 (using proprietary ASC technology to help people with speech disabilities resulting from stroke, degenerative disease, or developmental disorders); CTIA Comments on 2024 CVAA Biennial Report, CG Docket No. 10-213, at 18-19 (filed May 6, 2024) (stating that Samsung's Bixby digital app allows for the creation of a personal voice, Apple's new Live Speech feature—which turns typed text into spoken words—can be paired with a tool to enable people to create a voice that sounds like them, and Whispp has a new solution that converts whispered and vocal-cord-impaired speech into the user's natural voice in real time).

[48] *Access To Video Conferencing Implementation of Sections 716 and 717 of The Communications Act of 1934, as Enacted by the Twenty-First Century Communications and Video Accessibility Act of 2010*; *Telecommunications Relay Services and Speech-To-Speech Services for Individuals with Hearing and Speech Disabilities; Petition of Sorenson Communications, LLC for a Limited Waiver of the Privacy Screen Rule*, CG Docket Nos. 23-161, 10-213, 03-123, Report and Order, Notice of Proposed Rulemaking, and Order, 38 FCC Rcd 6300, 6302, para. 4 (2023) (*2023 IVCS Order and NPRM*).

[49] *2023 IVCS Order and NPRM*, 38 FCC Rcd at 6333, paras. 91-93.

[50] Analog TRS Transition White Paper at 8.

[51] *Id*.

[52] *Id*.

smartphones.[53] Although RTT is not yet natively available on wireline voice networks,[54] the authors of the White Paper state that wireline RTT is "desperately needed" to ensure the availability of a universal, integrated text solution.[55] Commenters urge the Commission to proactively plan for RTT to replace TTY on wireline networks, provide guidance and action to ensure functionally equivalent service during this transition, and inform legacy TTY users about alternative communication options.[56]

16. For deafblind individuals, there have been significant advancements in technology. The Commission has adopted a definition for "Video-Text Service," a specialized form of VRS that allows deafblind individuals who use sign language and text to communicate through a video link.[57] In this service, the communications assistant (CA) interprets the Video-Text Service user's sign language into voice for the other party and types the other party's voiced communication, which sends text to peripheral devices like Braille displays. The Commission recently decided to increase compensation for this specialized service, providing an add-on rate to support its availability by allowing recovery of its additional costs.[58] IP Relay also offers benefits for individuals who are deafblind.[59] Several states recently established communication facilitator programs using intrastate funds to provide telecommunications access for individuals who are deafblind.[60]

17. *Integration of accessible telecommunications functionalities into smart devices*. Functionalities similar to existing TRS are increasingly being built directly into smart devices and applications, often at no additional cost to the consumer or the TRS Fund. Examples include Google and Apple's Live Caption Service for Android and Apple devices, respectively, which provide real-time captions for voice and video calls, mirroring the functionality of IP CTS.[61] The Commission has also

[53] *Transition from TTY to Real-Time Text Technology*; *Petition for Rulemaking to Update the Commission's Rules for Access to Support the Transition from TTY to Real-Time Text Technology and Petition for Waiver of the Rules Requiring Support for TTY Technology*, Report and Order and Further Notice of Proposed Rulemaking, 31 FCC Rcd 13568, 13605, para. 71 (Dec. 16, 2016) (*2016 RTT Order*).

[54] Analog TRS Transition White Paper at 8; *see also* FCC Disability Advisory Committee (DAC), Real-Time Text Deployment in Wireline Networks at 2 (2022) (DAC RTT on Wireline Networks Report), https://www.fcc.gov/file/22908/download.

[55] Analog TRS Transition White Paper at 9 ("RTT support by wireline providers is desperately needed, as wireline service remains an important source of connection for legacy TTY users").

[56] Analog TRS Transition White Paper at 15; CommunicationFirst Comments at 4; Hamilton Relay Comments at 3; Missouri PSC Comments at 5; Virginia Relay Comments at 3-4; AO Reply at 2-3.

[57] 47 CFR § 64.601(a)(58) (definition of video-text service).

[58] *Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities*; *Structure and Practices of the Video Relay Service Program*, CG Docket Nos. 03-123 and 10-51, Report and Order and Further Notice of Proposed Rulemaking, 38 FCC Rcd 9157, 9198-9200, paras. 104-109 (2023) *(2023 VRS Compensation Order*).

[59] *See Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities*; *Petition for Rulemaking of Sprint Corporation*, CG Docket No. 03-123, Notice of Proposed Rulemaking, 36 FCC Rcd 12943, 12949, para. 14 (2021); *InnoCaption IP Relay Certification Order*, 39 FCC Rcd at 13804, para. 13; *2023 IVCS Order and NPRM*, 39 FCC Rcd at 6333, para. 91.

[60] *See, e.g.,* Maryland Relay, *Communication Facilitator (CF) Service*, https://mdrelay.maryland.gov/Pages/CommunicationFacilitatorService.aspx (last visited Aug. 11, 2025); Bridges Oregon, *Communication Facilitator Services*, https://bridgesoregon.org/cf/ (last visited Aug. 11, 2025). *See also* Disability Advisory Committee, Report on Recommendations on Best Practices for TRS Users with Multiple Disabilities, at 6 (2024), https://www.fcc.gov/ecfs/document/10312300613204/1 (urging the Commission to allow compensation from the Interstate Fund for Communication Facilitators when needed for functional equivalency).

[61] *See* Google, *Live Caption: Caption media and calls on your device*, https://support.google.com/accessibility/android/answer/9350862?hl=en (last visited Aug. 11, 2025); Apple Inc., *Get*

(continued….)

sponsored research into the integration of relay service functionality into mobile devices, in such a way that separate apps and multiple phone numbers would not be necessary.[62] Off-the-shelf technologies such as amplified telephones, high-definition Voice over IP (VoIP), video over broadband, and various text-based communication applications (e.g., email, SMS, instant messaging, and online chat) offer functionally equivalent alternatives or supplements to traditional TRS.[63]

18. These significant technological advances, coupled with the challenges posed by the declining use of analog relay services and the ongoing shift to IP networks, make it essential to modernize TRS. The Commission's statutory mandate requires ensuring TRS is available "to the extent possible and in the most efficient manner" and that its regulations "do not discourage or impair the development of improved technology."[64] This confluence of innovation and obsolescence presents a compelling need for federal and state policymakers to proactively adapt TRS obligations and programs, ensuring that all individuals with communication disabilities can continue to access functionally equivalent services in an increasingly IP-centric world.

III. NOTICE OF PROPOSED RULEMAKING

A. TTY-based Relay Service

1. Terminating Mandatory Status of TTY Relay

19. Under section 225 of the Act, states are permitted, but not required, to establish their own TRS programs, whose *intra*state use is supported by state-established funding mechanisms.[65] The provision of *inter*state relay services offered through Commission-approved state TRS programs is supported by the TRS Fund. Currently, to gain Commission approval, state TRS programs must offer TTY Relay and STS.[66]

20. TTY is widely acknowledged to be an outdated technology.[67] Over time, the use of TTY Relay has declined greatly, reflecting a shift towards Internet-based TRS solutions, such as IP Relay,

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live captions of spoken audio on iPhone, https://support.google.com/accessibility/android/answer/9350862?hl=en (last visited Aug. 11, 2025); *see also* Letter from Robert Felgar, CEO, Raz Mobility, to Marlene H. Dortch, Secretary, FCC, CG Docket Nos. 13-24, 03-123, at 1 (filed Nov. 20, 2020) ("Google Live Caption Service provides a greater degree of accessibility and functional equivalence at no cost to the [TRS] fund").

[62] *See* Rochester Institute of Technology, *Center on Access Technology*, https://www.rit.edu/accesstechnology/project-iris (last visited Aug. 11, 2025).

[63] *See 2018 IP CTS Order and Declaratory Ruling*, 33 FCC Rcd at 5869, para. 159 (asking for comment on how the use of off-the-shelf and other technologies can provide functional alternatives to, or supplement, IP CTS).

[64] 47 U.S.C. § 225(b)(1), (d)(2).

[65] *Id*. § 225(f).

[66] *See* 47 CFR § 64.603 (requiring common carriers to provide telecommunications relay services throughout the area in which they offer services, Interstate Spanish language relay service, and STS). In 2000, the Commission determined that TRS was not limited to TTY Relay, expanding TRS to include STS and VRS. *See 2000 TRS Order*, 15 FCC Rcd at 5147-53, paras. 13, 15, 22. In doing so, the Commission also introduced the concept that while a service could meet the definition of a telecommunications relay service, the Commission would not mandate common carriers to offer that service in order to meet its obligations under section 225. *See id*. at 5152, para. 22. Instead common carriers that opted to meet their obligation to provide TRS in part through contributions to the interstate TRS Fund would also contribute to the cost recovery of these non-mandatory forms of TRS. *Id*. The Commission declared TTY Relay and STS mandatory forms of TRS for which state TRS programs must allow cost recovery for the provision of intrastate TRS. VRS was declared a non-mandatory form of TRS, and the determination as to whether future new types of TRS would be mandatory would be decided at introduction of the service.

[67] Analog TRS Transition White Paper at 2.

VRS, and IP CTS.[68] Currently, annual intrastate usage of TTY Relay totals less than 2 million minutes with many jurisdictions reporting less than 1,000 minutes in 2024.[69] As communication networks modernize and usage declines, state relay programs are seeking guidance from the Commission regarding the appropriate steps and processes for phasing out TTY Relay.[70]

21. Given the ongoing technology transition to IP-based networks, and the obsolescence of TTY Relay, we seek comment on terminating the mandatory status of TTY Relay for state-based TRS programs.[71] We believe this would allow states to adapt their programs to local needs and technological realities, rather than being burdened by the costs and administrative complexities of maintaining a service with greatly diminished demand. What are the administrative and financial implications for state programs if TTY Relay is no longer mandatory? How would terminating the mandatory status of TTY Relay impact state programs' ability to continue supporting other essential relay services?

22. We believe that terminating the mandatory status of TTY Relay is consistent with the Commission's statutory obligations under section 225 of the Communications Act, which directs us to ensure that TRS "are available, to the extent possible" to eligible individuals in the United States.[72] We seek comment on this belief. As discussed below, we believe a number of alternative services will be available to ensure that functionally equivalent communication is available to the remaining users of TTY Relay, in those states that choose to terminate the availability of this service through the state TRS program. For example, IP Relay has long been available to any user with broadband access. In addition, we encourage state programs to offer RTT-based relay service in place of TTY Relay, to the extent that governing state legislation permits support for such a service through the state TRS program. We also seek comment on whether to provide TRS Fund support for a nationwide RTT-based relay service. Further, as a transitional step, to ensure that text-based relay service continues to be available to any user that does not yet have access to an IP-based alternative, we seek comment on whether to authorize the temporary certification of a national provider of TTY Relay, which would be available in any state where TTY Relay is no longer available through a state TRS program.

23. We also seek comment on whether ending the mandate that state TRS programs support TTY Relay, but temporarily certifying a national provider, will help the Commission achieve its statutory goals by ensuring that TRS are available "in the most efficient manner."[73] Does allowing state TRS programs to discontinue TTY relay relieve analog TRS providers from incurring unnecessary costs? Will it allow analog TRS providers the ability to reallocate funds and other resources to more efficient technology? Will intrastate or interstate TRS Fund contributors experience any cost savings? What are the costs and benefits to state TRS programs discontinuing TTY Relay? What would be the costs and benefits to continue requiring state TRS program to support TTY Relay? We also seek comment on whether ending the mandate to support TTY Relay will further the Act's directive that our TRS regulations encourage the use of existing technology and do not discourage or impair the development of improved technology.[74] Will these actions help transition TTY Relay providers and their remaining users

[68] *See supra* Part II.B. (decline in the use of analog relay services and emergence of advanced Internet-based solutions).

[69] *See* 2025 TRS Fund Report, Exh. 1-1.

[70] Analog TRS Transition White Paper at 1; In the Matter of the Consolidation of The Relay Missouri Fund, Missouri Public Service Commission, File No. TO-2024-0033 (March 1, 2024), at 6, https://efis.psc.mo.gov/Document/Display/772752 (Missouri PSC Memorandum) (stating even with low usage, "[a]bsent more FCC guidance, it seems premature for any state commission to consider phasing-out analog relay service because it will likely create a chaotic situation if common carriers must somehow take-over this responsibility.").

[71] 47 CFR § 64.603(a).

[72] 47 U.S.C. § 225(b)(1).

[73] *Id*.

[74] *Id*. § 225(d)(2).

from entirely text-based relay over the public switched telephone network (PSTN) to multimedia offerings that make full use of the Internet's capabilities to leverage new technologies to meet user needs?[75] Are there other approaches the Commission should consider to ensure a smooth transition from TTY Relay to IP-based alternatives?

24. We seek comment on whether terminating the mandatory status of TTY Relay is consistent with the obligation of common carriers under section 225(c) to provide telecommunications relay services "in compliance with the [Commission's] regulations" throughout the area in which they offer service.[76] Under section 225, the Commission has the same oversight and authority with respect to ensuring the availability and provision of both intrastate and interstate TRS.[77] Pursuant to this authority, the Commission is directed to set the requirements for ensuring the provision of TRS and for certifying state programs.[78] Further, the Commission determined that TRS were not limited to TTY Relay,[79] and set guidelines for whether a particular type of TRS must be included within a state TRS program.[80] We believe a common carrier remains compliant with its obligation to offer TRS so long as its interstate TRS offerings align both with the Commission's TRS rules[81] and, where applicable, a state TRS program certified under the Commission's rules.[82] We believe section 225 does not mandate a particular form of TRS be provided and affords the Commission the ability to re-align its rules around changes in technology, including the ability to wind down forms of TRS that are technologically obsolete.[83] We seek comment on this belief.

2. Alternatives to TTY Relay

25. *Scope of Current TTY Use.* Although TTY Relay usage is diminishing, some people with speech or hearing disabilities still rely on TTY devices. Such individuals should not be left without an effective means of telephone communication. We seek comment on how TTY Relay users can be most effectively and efficiently transitioned to productive alternatives.

26. To better understand the transitioning landscape, we seek comment on the total number of users of TTY Relay (in particular states or in the nation as a whole), as well as any available data on user location and the extent to which TTY Relay users are utilizing wired or mobile wireless devices to connect.

27. *IP Relay*. IP Relay is a form of Internet-based TRS that allows an individual to communicate in text using an IP-enabled device via the Internet.[84] Devices commonly used to access IP Relay include computers, smartphones, and tablets. Historically, an IP Relay user's calls are initiated through the Internet with the IP Relay user dialing the other party directly. This differs from analog TTY service, which requires a user to dial 711 to be connected with a CA and then the intended recipient of their call. Using IP Relay, a user calls the other party directly and a CA will be automatically connected to the call. An IP Relay user can receive a call in the same manner, where the calling party dials the

[75] *See 2018 IP CTS Order and Declaratory Ruling*, 33 FCC Rcd at 5831, para. 58 (the Commission's definition of relay services has steadily evolved, as new and innovative technologies have been developed).

[76] 47 U.S.C. § 225(c).

[77] *Id*. § 225(b).

[78] *Id*. § 225(d), (f).

[79] *2000 TRS Order*, 15 FCC Rcd at 5147-48, para. 13.

[80] *See id*. at 5152, para. 22.

[81] 47 U.S.C. § 225(c)(1).

[82] *Id*. § 225(c)(2).

[83] *Id*. § 225(d)(2).

[84] 47 CFR § 64.601(a)(27).

user's ten-digit telephone number, and the call is routed to the IP Relay platform to connect the user and the CA to the call. Recently, the Commission certified new providers of IP Relay using full automatic text-to-speech and ASR, expanding the options available to users of text-based communications.[85] These new services allow the IP Relay user to directly connect to the called party using an application (app)-based VoIP service, utilizing text-to-speech technology to convey the typed communications and ASR to generate a text-based response from the called party. We seek comment on the extent to which IP Relay can serve as a comprehensive alternative for current TTY Relay users and what, if any, additional steps the Commission should take to facilitate this transition. Does the requirement for users to have an IP-enabled device and broadband Internet access service present a barrier to its use by some current TTY Relay users?[86] Are IP Relay providers ensuring direct communications between IP Relay users? What types of barriers are TTY Relay users most likely to experience? Are there steps the Commission could take to mitigate such barriers?

28. *RTT-based relay service*. While functionally similar to TTY in its operation over a voice communications service, RTT offers significant improvements over TTY, including full duplex operation, seamless integration of voice and text, and a full international character set, making it a versatile and accessible alternative for TTY users.[87] RTT communications are able to be converted to be read on TTY devices and messages sent via TTY devices can be read on devices supporting RTT. Given the availability of RTT on mobile devices and the suitability of RTT for transmitting text on IP networks, we believe that many TTY Relay users are currently using RTT, rather than a TTY device, to initiate or answer TTY Relay calls. If an individual initiates such a call using RTT to dial 711, the call may be converted to the TTY format for communication with a CA. Where an end-to-end RTT link is possible, a conversion to the TTY format is technically unnecessary and likely to provide a less reliable text-based communication channel to the TTY Relay user. We seek comment on the extent to which such conversion is occurring, and why. For example, are there network concerns where the conversion to the TTY-based format is outside the control of the TTY Relay providers who would accept RTT communications if the format was retained when the call reached their call center? Are there economic concerns that hinder state programs from supporting or TTY Relay providers from installing the capability to handle RTT calls in TTY Relay call centers? Or are there legal considerations, e.g., a concern that if the link between user and CA is IP from end to end, the call might not qualify for financial support by the state TRS program or the TRS Fund? Are there other technological or administrative concerns that are inhibiting the transition to end-to-end RTT?

29. We believe that nothing in the Act restricts state programs from offering intrastate, RTT-based relay service. Indeed, section 225 of the Act expressly authorizes states to establish programs for the provision of intrastate TRS, subject only to Commission approval. The only conditions required for such approval are that the program (1) makes intrastate TRS available to eligible individuals in accordance with the Commission's regulations, and (2) provides adequate procedures and remedies for enforcing the program's requirements.[88] In light of this explicit statutory authorization, the Commission has previously determined that states are not precluded from funding and administering VRS, IP Relay, or IP CTS, should they choose to do so.[89] We seek comment on this belief and analysis.

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[85] *InnoCaption IP Relay Certification Order*, 39 FCC Rcd 13800; *Nagish IP Relay Certification Order*, 39 FCC Rcd 13811.

[86] *See 2025 ASCII NPRM*, paras. 14, 16.

[87] Analog TRS Transition White Paper at 8.

[88] 47 U.S.C. § 225(f).

[89] *Misuse of Internet Protocol (IP) Captioned Telephone Service*; *Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities*, CG Docket Nos. 13-24, 03-123, Report and Order, 34 FCC Rcd 11265, 11278, para. 32 (2019) (*2019 IP CTS Contributions Order*); *Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities*; *Structure and*

(continued….)

30. We also seek comment on whether a RTT-based relay service would provide a useful alternative to TTY Relay. We assume that such a service would operate similarly to TTY Relay, in that the CA would voice the TRS user's typed text to a hearing party and type the hearing party's speech back to the TRS user. In addition, we assume that, at least initially, a user would initiate a RTT-based relay call in the same way as TTY Relay—by dialing 711 to connect with a CA. The main difference would be that the link between the texting user and the CA would be carried entirely as an IP format, using the RTT protocol. Are these assumptions correct or are there more efficient RTT-based relay service implementations currently operating?

31. Should the Commission amend its rules to expressly authorize compensation from the TRS Fund for the interstate use of RTT-based relay service? What are the costs and benefits of making an RTT-based relay service available as a replacement for TTY Relay? Would the availability of an RTT-based relay service be more beneficial than IP Relay for some current TTY Relay users—and if so, in what specific ways? For example, would it be easier for TTY Relay users to transition to an RTT-based service than to IP Relay, and if so, in what respects? How would the two types of services compare in their handling of emergency 911 calls?[90] Would there be significant cost differences between IP Relay and RTT-based relay service?

32. We also seek comment on whether an RTT-based relay service could be modified to enable callers to initiate a TRS call without dialing 711, allowing the user to make and receive direct dialed calls. How could such call initiation methods be implemented, and how would their introduction affect the cost-benefit comparison with IP Relay? Further, how does the availability of text-to-speech software on RTT calls affect the need to connect to a CA and utilize relay? Is ASR technology similarly available for RTT calls? Where a consumer can place an end-to-end RTT call does the ability to communicate via text, voice, text-to-speech software, and ASR alleviate the need to involve a CA to relay the call?

33. Would all state TRS programs be able and willing to support RTT-based relay service for intrastate communications? Are there obstacles that would prevent state programs from supporting RTT-based relay? If some states are not able to support RTT-based relay, should we establish a nationwide form of RTT-based relay service that would be solely supported by the Interstate TRS Fund, and available in any state that does not maintain a TRS program offering such a service? Or is the availability of IP Relay—as well as the availability of text-to-speech software on smartphones or other devices—sufficient to ensure access to text-to-voice communication, so that we do not need to establish new forms of text-based relay service to ensure functionally equivalent access to the voice communication services?

34. While RTT has largely replaced TTY on wireless networks, its utility as a direct substitute for TTYs on wireline voice networks is currently limited as it is not natively available on wireline devices.[91] The Commission has previously acknowledged the importance of continued

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Practices of the Video Relay Service Program; *Misuse of Internet Protocol Relay Service*, CG Docket Nos. 03-123, 10-51, 12-38, Report and Order, 37 FCC Rcd 8037, 8041, para. 13 (2022) (*2022 VRS and IP Relay Contribution Base Order*).

[90] We note that emergency communication using Internet-based relay services presents technical challenges not present in analog relay services. Associating a wireless device's geolocation with the TRS-assigned phone number and transmitting that location to a Public Safety Answering Point (PSAP) is not yet fully feasible across all current relay platforms. Analog TRS Transition White Paper at 13-14. The Commission is addressing these issues within its Next Generation 911 (NG911) initiatives, proposing rules to ensure that wireline, interconnected VoIP, and Internet-based TRS providers deliver 911 calls, including location information, in an IP-based format when PSAPs are ready to receive NG911 calls. *See Facilitating Implementation of Next Generation 911 Services (NG911)*, PS Docket Nos. 21-479, 13-75, Further Notice of Proposed Rulemaking, 40 FCC Rcd 2668 (2025); *Facilitating Implementation of Next Generation 911 Services (NG911)*, PS Docket No. 21-479, Notice of Proposed Rulemaking, 38 FCC Rcd 6204 (2023).

[91] Analog TRS Transition White Paper at 8; DAC RTT on Wireline Networks Report at 2.

exploration into wireline RTT as an alternative to TTY technology to achieve a universal, integrated text solution for voice services.[92] We seek comment on furthering the availability of RTT across IP networks, services, and equipment. Should we extend the TTY support exemption, which allows voice communications services provided over wireless IP facilities and equipment to support RTT, in lieu of continuing to provide TTY connectability and TTY signal compatibility, to include interconnected and non-interconnected VoIP services provided over wired IP facilities and equipment, if such services and equipment support RTT?[93] How else should we encourage wireline providers to support RTT? We also solicit comments on the necessary technical guidance and cost expectations for wireline RTT implementation.[94]

3. Addressing TTY Relay Abuse and Concerns

35. In ensuring the availability of TRS and overseeing the TRS Fund, the Commission must be a good steward of TRS funds and act to prevent or address instances of waste, fraud, and abuse in the TRS program. In amending its rules in 2016 to ensure that RTT is compatible with TTY technology and can be used to reach TTY Relay, the Commission broadened the means of access to TTY Relay. However, such wider access also raised the potential for misuse. To access and use TTY Relay, a user no longer needs to purchase an analog TTY device. Anyone with a smartphone or other wireless device that supports RTT can make a TTY Relay call. As a result, it is easier for individuals with no communication-related disability to misuse TTY Relay in an attempt to hide their identities or otherwise deceive a called party by communicating through a CA.

36. To ensure that TTY Relay is used appropriately and efficiently, and to safeguard the TRS Fund from waste, fraud, and abuse, we seek comment below on applying user eligibility, registration, verification, and call detail records requirements to all forms of TRS[95]—measures that have proven effective in safeguarding other TRS programs.[96] We seek comment on the specific processes for TTY Relay user registration and verification, including the type of documentation or assessment required to confirm eligibility and how to balance ease of access for legitimate users with robust protections against misuse. Are providers able to verify the identity of TTY Relay users at the beginning of calls? Would user registration requirements unduly burden state TRS programs in their support and oversight of intrastate TRS?

B. Captioned Telephone Service

37. As the telecommunications infrastructure continues its transition from analog systems to IP-based networks, the usage of analog CTS has steadily declined.[97] Analog CTS services are administered at the state level, with states typically contracting with a single provider.[98] While most state

[92] *2016 RTT Order*, 31 FCC Rcd at 13605, para. 71.

[93] 47 CFR §§ 6.3(a)(3), (b)(5), 14.21(d)(5).

[94] Missouri PSC Comments at 5; Analog TRS Transition White Paper at 15-16.

[95] *See infra*, paras. 74-79.

[96] *See* 47 CFR § 64.611(a) (requirement for registration of IP Relay and VRS users); *id.* § 64.611(a)(4) (requirements for transmission of VRS registration data to the TRS User Registration Database); *id.* § 64.604(c)(5)(iii)(D)(*2*); *id.* § 64.615(a)(6) (requiring the TRS User Registration Database to be capable of performing identification verification checks); *Telecommunications Relay Services and Speech-To-Speech Services for Individuals with Hearing and Speech Disabilities*; *E911 Requirements for IP-Enabled Service Providers*, CG Docket No. 03-123, CC Docket No. 98-67, WC Docket No. 05-196, Second Report and Order and Order on Reconsideration, 24 FCC Rcd 791, 809-10, paras. 37-38 (2008) (*iTRS Second Numbering Order*).

[97] *See supra*, Part II.B. (Background, Recent Developments).

[98] *See 2019 IP CTS Contributions Order*, 34 FCC Rcd at 11277, para. 31.

TRS programs support CTS, the Commission does not mandate support for CTS.[99] In the absence of a mandate, many states have chosen to wind down and discontinue their analog CTS services, in response to declining demand.[100] As other state TRS programs consider whether to continue supporting CTS, we believe it is beneficial to provide oversight and guidance to ensure users are able to successfully transition to alternative solutions.

1. Alternatives to CTS

38. *IP CTS.* One prominent alternative to analog CTS is IP CTS. Analog CTS is provided over specialized wireline or landline phones connected to the PSTN and equipped with screens that display captions of what the other party is saying. Analog CTS users will automatically see captions on outgoing calls, but users with only one telephone line will only see captions on incoming calls if the caller first calls the captioning service call center. Users with two telephone lines can receive captions from direct dialed incoming calls. IP CTS users can access captions on a variety of devices that connect to the Internet rather than the PSTN, including specialized IP CTS equipment or commonly available off-the-shelf devices such as computers, tablets, or smartphones.[101] IP CTS is administered by the Commission and supports multiple national providers.

39. Technological advancements have significantly modernized IP CTS, particularly through the integration of ASR technology.[102] The Commission has authorized IP CTS providers to use ASR-only mode to generate captions, either as an exclusive method or as an alternative to CA-assisted captioning.[103] Several IP CTS providers offer fully automated ASR-only service, while other providers offer users the flexibility to choose between CA-assisted and ASR-only captioning. This choice aligns with the Commission's policy of promoting consumer choice.[104] The viability of IP CTS as a direct alternative to analog CTS has been demonstrated in practice; for instance, when analog CTS service was discontinued in Missouri, five out of six users successfully transitioned to IP CTS service, underscoring its effectiveness as a modern solution.[105]

40. *Native ASR Functions on Smart Devices*. As the telecommunications landscape continues to evolve, smart devices and applications are increasingly incorporating ASR functionalities that are comparable to existing IP CTS offerings. For example, most modern smartphones and tablets now provide the option for automated captioning of incoming audio during live telephone and video

[99] *See* 47 CFR § 64.603; *2003 CTS Declaratory Ruling*, 18 FCC Rcd at 16129, para. 22 (recognizing CTS as a form of TRS and permitting reimbursement from the TRS Fund and permitting, but not requiring state TRS Fund programs to offer and reimburse for the service).

[100] *See* Missouri PSC Comments at 2 ("many states have discontinued the [analog CTS] service such as Alabama, Alaska, Arkansas, Delaware, Hawaii, Kansas, New Jersey, South Dakota and West Virginia"); *see also* AO Reply at 2.

[101] 47 CFR § 64.601(a)(26).

[102] *2018 IP CTS Order and Declaratory Ruling*, 33 FCC Rcd at 5827, para. 48.

[103] *See Internet Protocol Captioned Telephone Service Compensation*; *Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities*; *Misuse of Internet Protocol (IP) Captioned Telephone Service*, CG Docket Nos. 22-408, 03-123, and 13-24, Notice of Proposed Rulemaking and Order on Reconsideration, 37 FCC Rcd 15243, 15245, para. 7 (Dec. 22, 2022) (*2022 IP CTS Compensation Notice*).

[104] *See Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities*, CG Docket No. 03-123, Memorandum Opinion and Order, 36 FCC Rcd 7246, 7257, para. 24 (2021) (prior Commission rulings have favored competition among TRS providers to offer consumers different versions of TRS using various technologies and features); *see also 2018 IP CTS Order and Declaratory Ruling*, 33 FCC Rcd at 5829-30, para. 52 (consumers are unrestricted in their choice of service providers and "will continue to be able to select an IP CTS provider based on the overall quality of service each provider offers by means of the available methods").

[105] Missouri PSC Comments at 3.

conversations.[106] This functionality is often available at no additional cost to the consumer or the TRS Fund.[107] We seek comment on the extent to which ASR functionalities on smart devices are comparable in quality and speed of captions currently offered through Fund-supported IP CTS providers and whether such services present a viable and efficient alternative for users transitioning from analog CTS. Does the direct availability of captions with ASR on smart devices and applications for use by hearing individuals to communicate using voice communication services suggest a separate relay service is unnecessary? Should the Commission take any steps to ensure that such communications service providers and equipment manufacturers are providing access to captions under separate statutory authority granted to the Commission, such as our authority to ensure telecommunications services and advanced communications services are accessible to and usable by individuals with disabilities?[108]

41. *CTS Alternatives for Users without Broadband Access.* The transition to IP-based services, including IP CTS and technologies using ASR, requires Internet access and IP-based specialized equipment which may not be universally available.[109] To help transition these users we solicit comments on the feasibility of and burden to state relay programs, telecommunications carriers, and VoIP providers offering appropriate devices to users who wish to transition from CTS to an alternate service (e.g., IP CTS or an appropriate smart device or application offering comparable ASR functions) but may require new equipment due to network changes or device obsolescence. Are there lessons state programs that have discontinued analog CTS support have learned that may be useful to the Commission and users during the transition to an alternate service?

2. Addressing CTS Concerns

42. To ensure that CTS is used appropriately and efficiently, and to safeguard the TRS Fund from waste, fraud, and abuse, we seek comment below on applying user eligibility, registration, verification and call detail records requirements to all forms of TRS[110]—measures that have proven effective in safeguarding other TRS programs.[111] We seek comment on the specific processes for CTS user registration and verification, including the type of documentation or assessment required to confirm eligibility and how to balance ease of access for legitimate users with robust protections against misuse.

C. Speech-to-Speech Relay Service

43. In authorizing the provision of STS in March 2000, the Commission determined that all

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[106] *See* Google, Live Caption: Caption media and calls on your device, https://support.google.com/accessibility/android/answer/9350862?hl=en (last visited Aug. 11, 2025); Apple Inc., Get live captions of spoken audio on iPhone, https://support.google.com/accessibility/android/answer/9350862?hl=en (last visited Aug. 11, 2025). *See also 2004 IP CTS Compensation Order*, 39 FCC Rcd at 9127, para. 62 & n.192 (noting that live captions are available natively on recent iPhone and Android models).

[107] *See* Letter from Robert Felgar, CEO, Raz Mobility, to Marlene H. Dortch, Secretary, FCC, CG Docket Nos. 13-24, 03-123, at 1 (filed Nov. 20, 2020), https://www.fcc.gov/ecfs/document/11201950406499/1 (Raz Mobility Ex Parte) ("Google Live Caption Service provides a greater degree of accessibility and functional equivalence at no cost to the [TRS] fund"). *But see* Letter from Tamar E. Finn and Danielle C. Burt, Counsel to ClearCaptions, LLC, to Marlene H. Dortch, Secretary, FCC, CG Docket Nos. 13-24, 03-123 (filed Dec. 7, 2020) (responding to Raz Mobility's statements).

[108] *See* 47 U.S.C. §§ 255, 617.

[109] Analog TRS Transition White Paper at 11; CommunicationFIRST Comments at 2; AO Reply at 2.

[110] *See infra*, paras. 74-79.

[111] *See* 47 CFR § 64.611(a) (requirement for registration of IP Relay and VRS users); *id.* § 64.611(a)(4) (requirements for transmission of VRS registration data to the TRS User Registration Database); *id.* § 64.604(c)(5)(iii)(D)(*2*); *id.* § 64.615(a)(6) (requiring the TRS User Registration Database to be capable of performing identification verification checks); *iTRS Second Numbering Order*, 24 FCC Rcd 791, 809-10, paras. 37-38.

certified state TRS programs must offer STS.[112] STS demand is consistent, with annual usage less than 400,000 minutes. However, unlike TTY Relay and CTS, STS usage has not declined substantially over time.[113]

44. The emergence of IP-based solutions has offered new avenues for people with speech disabilities to access communications services.[114] The development of specialized ASR engines for speech-to-speech is particularly promising, as these can be designed to make non-standard or atypical speech more comprehensible. Commenters have advocated for the integration of such ASR engines to facilitate clearer communication, especially within video conferencing platforms, asserting that these functionalities could be crucial for accessibility.[115] Furthermore, text-to-speech functionality on these video conferencing platforms is also being explored to ensure accessibility for people with disabilities who need to communicate by text.[116] This could directly benefit individuals with speech disabilities who cannot or choose not to use traditional STS.[117]

45. In 2011, a non-profit organization asked the Commission to open a proceeding on modernizing STS to incorporate IP video technologies.[118] With video-assisted STS, the CA would watch the user's face and any available seen body parts or indicators to add meaning that is translatable by the CA into clear speech that can be voiced to the person called.[119] This concept, referred to as video-assisted Speech-to-Speech (VA-STS), was noted in the Commission's *2013 IP STS Order*, which recognized that it was already being offered in several states.[120] We continue to believe that such an Internet-based,

[112] *2000 TRS Order*, 15 FCC Red at 5148-51, paras. 14-20 (STS).

[113] *See, e.g.*, 2016 TRS Rate Filing, Exh. 1-1 (reporting 235,942 intrastate conversation minutes for 2015); *id*., Exh. 2 (projecting 132,713 interstate conversation minutes for Fund Year 2016-17).

[114] *See supra* para. 17. (Integration of accessible telecommunications functionalities into smart devices) (giving examples of several IP-based solutions now available for people with speech disabilities).

[115] *See* Voiceitt, Inc. Reply, CG Docket Nos. 23-161, 10-213, 03-123, at 5 (filed Sept. 5, 2023), https://www.fcc.gov/ecfs/document/1090516100764/1 (encouraging the Commission to modify its rules to "ensure integration of and compatibility with ASR engines capable of making the speech of people with nonstandard or atypical speech comprehensible to others on video conference calls"); *see also* Letter from Karen Peltz Strauss, CSD, to Marlene H. Dortch, Secretary, FCC, CG Docket Nos. 23-161, 10-213, and 03-123, at 3 (filed April 30, 2024), https://www.fcc.gov/ecfs/document/10430158196257/1 (AAO Apr. 30 Ex Parte) (asking the Commission to require the ability for people with speech disabilities "to access both text-to-speech functionality and automated speech recognition functionalities that are specially designed to generate understandable speech for these individuals").

[116] *2023 IVCS Order and NPRM*, 38 FCC Rcd at 6322, para. 54.

[117] *See 2023 IVCS Order and NPRM*, 38 FCC Rcd at 6322, para. 54 (asking for comment on whether text-to-speech capability would make video conferencing platforms accessible "for people with speech disabilities who cannot or do not use [STS]").

[118] Speech Communications Assistance by Telephone (SCT), Petition for Rulemaking for Video Assisted STS to Facilitate Phone Communication for People with Severe Speech Disabilities, CG Docket No. 03-123 (filed Oct. 20, 2011), https://www.fcc.gov/ecfs/document/6016846585/1 (2011 VA-STS Petition).

[119] 2011 VA-STS Petition at 2.

[120] *Speech-to-Speech and Internet Protocol (IP) Speech-to-Speech Telecommunications Relay Services*; *Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities*, CG Docket Nos. 08-15, 03-123, Report and Order and Further Notice of Proposed Rulemaking, 28 FCC Rcd 10702, 10715, para. 27& n.105 (2013) (*2013 IP STS Order*) ("[i]t appears that VA-STS already is being offered in California, Louisiana, and Virginia. Minnesota has also announced its intention to begin providing this service"). *See also* Emergency Access Advisory Committee, *Working Group 3 Recommendations on Current 9-1-1 and Next Generation 9-1-1: Media Communication Line Services Used to Ensure Effective Communication with Callers with Disabilities*, at 1 (filed March 1, 2013) ("[v]ideo technologies such as Visually Assisted Speech-to-Speech (VA STS) are becoming a preferred communication mode for people with speech disabilities").

video-assisted form of STS holds significant potential to enhance functional equivalence for individuals with severe speech disabilities. We seek comment on this belief.

1. IP STS and video-assisted STS

46. Recognizing the significant technological advancements since the *2013 IP STS Order*,[121] we propose to recognize IP STS as a compensable form of TRS. This proposal includes video-assisted STS as an integrated or add-on component to IP STS, rather than a standalone service. We believe the service would likely be app or web-based to distinguish it from analog STS, which already permits users to make calls from interconnected VoIP services using Internet-enabled devices.[122] This approach aims to leverage the benefits of IP technology, such as enhanced call privacy, improved real-time quality and efficiency, and greater service reliability, which are increasingly realized through automation and over-the-top apps.[123] We seek comment on this proposal.

47. We also seek comment on whether authorizing such a service, with its inherent flexibility and potential for a wider range of communication modes, will significantly advance the statutory goal of functional equivalence for individuals with speech disabilities.[124] How would this structure best integrate with existing TRS frameworks? Should IP STS providers be directly certified by the Commission and compensated entirely through the Interstate TRS Fund similar to other IP-based forms of TRS?[125] Should IP STS calls directly connect to a call center allowing users to make and receive direct dialed calls? Are state TRS programs currently supporting and compensating a form of STS similar to this IP STS proposal? Are they supporting and compensating video-assisted STS? If so, do STS providers submit compensation claims for interstate STS minutes for IP STS or video-assisted STS? What are the specific benefits or challenges of positioning video-assisted STS as an add-on rather than a separate service or as part of the cost of providing IP STS? Should IP STS include or support the option for users to access and use ASR engines for non-standard or atypical speech? Is such technology already being made available in smart devices and applications for use within voice communication services, independent of TRS support?

48. To ensure efficient allocation of resources and effective program development, we seek comment on effective methodologies for assessing the potential demand for new IP STS and video-assisted STS offerings. How can we best identify and reach the segments of the community of people with speech disabilities who would benefit from these services? What data collection mechanisms or surveys would provide reliable estimates of demand and user preferences for IP STS and its features? In considering the potential demand should we distinguish between individuals likely to use the service and individuals who could use the service but may prefer to sign or text first?

2. STS Mandatory Status

49. We do not propose to alter the mandatory status of the analog version of STS at this time. STS remains a mandatory service that all states with a certified state TRS program must offer.[126] Currently, STS is provided only through state-certified relay service programs and has no Internet-based,

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[121] *2013 IP STS Order*, 28 FCC Rcd at 10714-15, para. 26.

[122] *Id*.

[123] *See, e.g., Nagish IP Relay Certification Order*, 39 FCC Rcd at 13816, para. 13 (in the IP Relay context, "automating the text-to-speech function appears likely to produce similar benefits to those of ASR by improving the real-time quality and efficiency of … conversations, enhancing call privacy, and improving service reliability"),

[124] 47 U.S.C. § 225(a)(3).

[125] *2000 TRS Order*, 15 FCC Rcd at 5154-56, paras. 22-27; *2002 IP Relay Declaratory Ruling*, 17 FCC Rcd at 7784-87, paras. 15-26; *Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities*; *Internet-based Captioned Telephone Service*, CG Docket No. 03-123, Declaratory Ruling, 22 FCC Rcd 379, 390, para. 25 (2006) (*2006 IP CTS Declaratory Ruling*).

[126] *See* 47 CFR § 64.603.

FCC-certified equivalent. This means that users of STS presently have limited alternatives to transition to if their state were to terminate the provision of analog STS. However, we may revisit the mandatory status of analog STS and its provision at such time as IP STS or other suitable IP-based solutions are sufficiently developed and widely available, and we can offer a seamless transition for users from analog STS to IP-based alternatives.[127] Are state programs able to maintain STS as a mandatory service if we move forward with the proposal to terminate the mandatory status of TTY Relay? Are there challenges associated with maintaining the mandatory status of STS but not TTY Relay?

3. Additional IP STS Requirements

50. *Provider certification.* To ensure the quality and accountability of IP STS, we propose that certification requirements for IP STS providers should be comparable to those established for other Internet-based TRS services, such as VRS, IP Relay, and IP CTS.[128] Specifically, applicants would be required to submit detailed plans for service provision, explanations of how they will comply with all relevant technical and operational standards, and descriptions of mechanisms for preventing misuse.[129] We seek comment on whether additional certification requirements should be established for IP STS providers. Should any particular technical capabilities be prerequisites for certification? Which existing certification requirements, if any, should not be applicable to IP STS?

51. *Refinement of Minimum Standards and Service Quality.* The introduction of IP STS necessitates a reevaluation and refinement of existing mandatory minimum standards for STS to ensure they remain relevant and effective.[130] Current STS rules address aspects such as CA competency and adherence to confidentiality, but some provisions, like those relating to only TTY Relay or VRS, would not be applicable.[131] Should any of the existing mandatory minimum standards not be applied to the provision of IP STS? We request that commenters who identify such rules, explain the incompatibility and propose changes to the rule to appropriately limit the scope of the rule. Are there other standards unique to the provision of IP STS that we should consider adding?

52. *Use of Caller Profiles and Specialized CA Training.* STS CAs require specialized training to understand and repeat the words of individuals with diverse speech patterns.[132] To enhance the quality and efficiency of STS, providers currently allow STS users to set up and utilize profiles or preferences to facilitate call connections.[133] We seek comment on the feasibility and benefits of implementing caller profiles for IP STS, including the types of information that would be necessary for effective routing, and the safeguards required to protect user privacy and prevent any misuse of user information.[134] Should users be able to identify preferences related to the user's unique speech characteristics? Would providing such preferences enable a user with a particular speech disability to have their calls routed to CAs or ASR engines specifically trained to understand that type of speech? We also seek comment on how specialized CAs and ASR engine training for IP STS, particularly for handling atypical speech patterns or utilizing new technologies, should be defined and supported.

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[127] *See* AO Reply at 1-2 and Missouri PSC Reply at 5 (asking the Commission to provide guidance to states to ensure that users of analog relay services have alternatives should such service be continued).

[128] *See* 47 CFR § 64.606 (Internet-based TRS provider and TRS program certification).

[129] *Id.* § 64.606(a)(2) (listing what an application for Internet-based TRS must include).

[130] *See id.* § 64.604 (mandatory minimum standards).

[131] *See, e.g.*, *id.* § 64.604(b)(1), (d).

[132] *Id*. § 64.601(a)(46).

[133] *See 2013 IP STS Order*, 28 FCC Rcd at 10724, para. 42.

[134] *See* 47 CFR § 64.604(a)(2)(i) (prohibiting providers and CAs from keeping records of the content of any conversation, with a limited exception for STS CAs who may retain information from a particular call in order to facilitate the completion of consecutive calls, at the request of the user).

53. *Provision of a Muting Option.* The Commission currently requires STS providers to offer the user the option of having their voice muted so that the other party to the call would only hear the STS CA re-voicing the call, and not also the voice of the STS user.[135] This feature serves to minimize disruption to the conversational flow and potentially enhance the privacy and comfort of the STS user.[136] Should we similarly require IP STS providers to offer a muting option to users, allowing them to control whether their own voice is transmitted to the called party? We seek comment on providers' experience with the muting feature in analog STS, as well as any technical issues regarding its implementation in an IP environment, its impact on call flow and functional equivalence, and any other benefits or challenges it may present for IP STS users.

54. *User Eligibility, Registration, and Verification Requirements.* To ensure that IP STS are used appropriately and efficiently, and to safeguard the TRS Fund from waste, fraud, and abuse, we propose to apply user eligibility, registration, and verification requirements similar to those already in place for IP Relay, VRS, and IP CTS.[137] This would include requiring users to register with a certified provider and undergo a verification process to confirm their identify and location, as well as to certify eligibility as individuals with speech disabilities who require the service for functionally equivalent communication.[138] We seek comment on the specific processes for IP STS user registration and verification, including the type of documentation or assessment required to confirm eligibility and how to balance ease of access for legitimate users with robust protections against misuse.[139]

55. *Data Requirements.* We believe IP STS providers should be subject to the same data submission requirements applicable to all TRS providers, which are designed to ensure effective oversight, fund administration, and accountability, and to enable the determination of a TRS Fund budget for each service, as well as the determination of provider compensation rates.[140] In section III.E.4 below, we seek comment on whether any modifications to our call data requirements are needed to ensure collection of appropriate data for this service and avoid unnecessary data collection.[141]

4. STS Outreach

56. A perceived challenge for STS has been the low awareness and resulting flat usage among its potential user base.[142] Due to concerns that potential STS users were not aware of the service's availability, the Commission in 2007 added a specific per-minute amount of $1.131 to the STS compensation rate, specifically for outreach purposes.[143] This additional funding was intended to promote STS to potential users and required providers to file annual reports detailing their specific outreach efforts

[135] *Id*. § 64.604(a)(1)(viii).

[136] *2013 IP STS Order*, 28 FCC Rcd at 10712, para. 19.

[137] *See* 47 CFR §§ 64.611 (Internet-based TRS registration, including certification of eligibility), 64.615 (TRS User Registration Database and administrator).

[138] *See* 47 CFR §§ 64.611, 64.615.

[139] In part III.E.3, we also seek comment on extending the application of user eligibility, registration, and verification requirements to analog TRS, including STS.

[140] 47 CFR § 64.604(c)(5)(iii)(D).

[141] We also seek comment on clarifying the applicability of this rule to analog TRS providers, including STS providers.

[142] *See, e.g.*, *2007 TRS Cost Recovery Order*, 22 FCC Rcd at 20163-64, paras. 53-56 ("potential STS users are not being made aware of this important service"). The National Institute on Deafness and Other Communication Disorders (NIDCD) estimates that 17.9 million adults in the United States had difficulty using their voices over the past twelve months, and approximately 1 in 14 (7.2%) U.S. children has had a speech disorder over the past twelve months. NIDCD, *Quick Statistics About Voice, Speech, Language*, https://www.nidcd.nih.gov/health/statistics/quick-statistics-voice-speech-language#1 (last visited Aug. 15, 2025).

[143] *2007 TRS Cost Recovery Order*, 22 FCC Rcd at 20166, para. 61.

attributable to this support.[144]

57. However, concerns persisted about the effectiveness of individual provider-led outreach, with suggestions to centralize STS outreach in a nationwide entity.[145] In 2013, the Commission proposed to adopt such a national outreach program for STS, tentatively concluding that centralizing STS outreach could be more effective in reaching and educating the population of Americans who could benefit from STS.[146] If a national outreach program for STS were adopted, the Commission proposed discontinuing the per-minute additive for STS outreach.[147] The Commission has not acted on this proposal. A National Outreach Program for VRS and IP Relay was launched in 2015 and was funded for two TRS Fund Years before expiring in 2017 without being reauthorized.[148] Currently, the per-minute additive for STS outreach remains, and individual STS providers continue to be responsible for outreach efforts directed at educating potential users and their families about the nature of the service, with annual reporting requirements.[149]

58. Despite the TRS Fund support for outreach by providers, STS usage remains flat and low in comparison to the number of people with speech disabilities. The availability of IP STS and the possibility of nationwide video-assisted STS may present a new opportunity to inform the public and potential users about the availability of these services. What steps should we take to ensure effective outreach concerning IP STS and video-assisted STS? We seek comment and data, especially from STS providers and state TRS programs, on the effectiveness over the last 25 years of outreach to potential STS users. How many individuals are using STS? What methods have providers used to market the service or provide outreach to potential users? Are there places, resources, or communities that are or could be targeted to reach people with speech disabilities who would benefit from learning about STS? To what extent have state TRS programs or STS providers conducted outreach to those places? Have STS providers developed outreach plans for STS? If not, why not? If so, we request information about the details of those plans, and comments on their strengths and weaknesses. Do providers work with organizations for people with speech disabilities to conduct outreach? How broad is the reach of those organizations?

59. If the Commission continues to provide an outreach additive or other additional outreach support and resources for STS, how should we measure the effectiveness of such outreach efforts? Should we consider such an additive for IP STS? Alternatively, is the low adoption rate for STS services not indicative of a lack or outreach and awareness, but rather a preference amongst individuals with speech disabilities for text or sign language communications through other forms of TRS and advance communication services? Do some individuals with speech disabilities prefer alternative services such as online messaging and chat tools or the use of other assistive technology, such as augmentative and alternative communication (AAC) devices? Do individuals with speech disabilities who are fluent in sign

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[144] *Id.*

[145] *Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities*, CG Docket No. 03-123, Order, 25 FCC Rcd 8689, 8699, para. 23 & n.67 (2010) (mentioning that the Interstate TRS Advisory Council passed a resolution recommending a nationwide marketing outreach entity to promote STS and noting that AT&T filed in support of this approach).

[146] *2013 IP STS Notice*, 28 FCC Rcd at 10719-20, para. 33.

[147] *Id*. at 10721, para. 36.

[148] *See Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities*; *Petition for Rulemaking of Sprint Corporation*, CG Docket No 03-123, RM-123, Report and Order, 37 FCC Rcd 8009, 8016, para. 17 & n.22 (2002) (*2022 IP Relay Compensation Order*).

[149] *See, e.g.*, *See Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities*; *Structure and Practices of the Video Relay Service Program*, CG Docket Nos. 03-123, 10-51, Order, 40 FCC Rcd 4354, 4356, para. 7 & n.20 (CGB 2025) (*2025 TRS Fund Compensation Order*) (noting that the per-minute compensation rate for STS includes a supplemental per-minute amount of $1.311 to be used for STS outreach).

language prefer to use VRS or other video-based forms of communication? If STS usage is a matter of preference rather than outreach should we discontinue the outreach additive? What are the potential costs and benefits to discontinuing the additive?

D. Transitioning Analog Relay Users to Alternatives

60. There may be some analog TRS users who, for various reasons, cannot successfully transition to IP-based telephony solutions without additional assistance.[150] We seek comment on the number of such individuals, the reasons they are unable to transition, and what means are available to ensure that such individuals remain able to communicate after the retirement of the copper facilities serving them. For example, are subsidies available at the state or federal level to ensure that analog TRS users who cannot otherwise afford to subscribe to Internet access service are able to transition to a VoIP line or other IP-based communications channel?

61. In a similar vein, we solicit comments on whether there are specific roles that state relay programs and communication service providers should fulfill to assist users who wish to transition to an alternate TRS service (e.g., IP CTS, IP Relay, or RTT-based relay service) but may require new communication services or equipment due to network changes or device obsolescence. How can consumers be informed of prerequisite service or equipment changes and how to obtain them? What options are available for coordination among interested parties for ensuring that analog TRS users who need it receive additional assistance? Are services obtained through universal service programs and equipment obtained through equipment distribution programs sufficiently compatible for the equipment to be used with the relevant services? Can those services and equipment be used with TRS and TRS equipment?

62. We also seek comment on the availability and feasibility of peripheral devices and specialized customer premises equipment that support captioned phone service or RTT and could be utilized for calls with VoIP services. Are VoIP services and RTT usable on the same device (e.g. smartphone, tablet, or laptop) by people with disabilities? Are there devices that support RTT and are able to connect to VoIP service devices, particularly VoIP devices without a screen for viewing text? What are the costs for developing such equipment? What are the costs to consumers to obtain such equipment? We also seek comment on how incurring these transitional costs would compare to the long-term savings associated with retiring obsolete hardware and software linked to analog networks, and whether the cost of these efforts should be compensable from the TRS Fund.

63. Beyond the technological alternatives, the Commission recognizes the benefit of a structured transition process to ensure that all individuals with hearing and speech disabilities maintain access to relay services as analog telecommunications networks transition to IP-based services.[151] To ensure that no analog relay user is left without usable TRS during this network evolution, the Commission seeks comment on developing outreach and transition plans for affected users in coordination with state TRS relay programs and analog TRS providers. Are state TRS programs able to coordinate with the Commission on such an initiative? Are state TRS programs better positioned to lead on plan development and outreach? If so, how should the Commission support such outreach and plan development? To what extent have state TRS programs and analog relay service providers begun to establish such plans. What is an appropriate timeline for the development and implementation of such plans and outreach? Are there other state programs, such as telecommunications equipment distribution programs, or state agencies, separate from TRS programs that the Commission should coordinate with? Should we coordinate with relevant agencies independently or in connection with membership associations, such as NASRA and the Telecommunications Equipment Distribution Program Association (TEDPA)? If a state is considering discontinuing its state TRS program, what role should the Commission fulfill in that transition?

[150] Analog TRS Transition White Paper at 11; CommunicationFIRST Comments at 2; AO Reply at 2.

[151] *See* AO Reply at 2 (emphasizing the "urgent need for transition planning").

64. We also seek comment on any barriers to coordination. To what extent are analog TRS providers limited in the information they are able to share with state TRS programs and the Commission for conducting outreach, while continuing to protect the privacy of customer information?[152]

E. Other Analog Relay Issues

1. Residual State TRS Programs

65. *Cost Recovery Issues*. The statutory cost recovery framework for TRS distinguishes between interstate and intrastate services. Generally, costs caused by interstate TRS are recovered from all subscribers for every interstate service, utilizing a shared-funding cost recovery mechanism.[153] Conversely, costs caused by intrastate TRS are generally to be recovered from the intrastate jurisdiction.[154] In states with a certified program under section 64.606 of our rules, the state agency must allow an intrastate TRS provider to recover costs through a method consistent with federal requirements.[155]

66. Where a form of TRS is not offered in state TRS programs, the Commission may adopt reasonable measures to ensure equitably distributed contributions from all interstate and intrastate service providers subject to the Commission's authority under sections 225 and 715 of the Act.[156] However, as the Commission has previously indicated, states are not precluded from funding and administering any form of intrastate TRS, including Internet-based TRS.[157] As users of TTY Relay, CTS, and STS transition to Internet-based options, we seek comment on the extent to which States plan to continue supporting any forms of TRS, once the telephone network has fully transitioned from analog to IP technology. For example, assuming that we affirm the eligibility of RTT-based relay service and IP STS for TRS Fund compensation, are states likely to support those forms of TRS? How does the broader ongoing transition towards an all-IP communication network impact state decision making? For states that pursue the provision of Internet-based forms of TRS, how should we ensure the appropriate separation of costs?

67. *Additional Programs Funded from a State's Intrastate TRS Fund*. Some states, leveraging their intrastate TRS funds, have expanded their offerings beyond analog TRS services to address the evolving communication needs of their residents. Many states operate telecommunications equipment programs, often supported by their intrastate TRS funds.[158] California's Deaf and Disabled Telecommunications Program, for example, provides subsidized telecommunications equipment for people with disabilities, including speech generating devices for people with speech disabilities.[159]

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[152] *See* 47 CFR §§ 64.2001-64.2011 (restricting disclosure and use of CPNI); *id.* § 64.5105 (use of CPNI without customer approval). For emergency calls, there are also specific limitations on the disclosure and use of information obtained while handling 911 calls. *Id*. § 9.14(b)(2)(vi).

[153] 47 U.S.C. § 225(d)(3); 47 CFR § 64.604(c)(5)(ii).

[154] 47 CFR § 64.604(c)(5)(ii).

[155] 47 U.S.C. § 225(d)(3)(B); 47 CFR § 64.604(c)(5)(ii).

[156] *2022 VRS and IP Relay Contribution Base Order*, 37 FCC Rcd at 8042, para. 15 (citing 47 U.S.C. §§ 225, 616).

[157] *2019 IP CTS Contributions Order*, 34 FCC Rcd at 11278, para. 32; *2022 VRS and IP Relay Contribution Base Order*, 37 FCC Rcd at 8041, para. 13; *see also* 47 U.S.C. 225(f) (providing for FCC certification of state TRS programs).

[158] TEDPA's website provides a list of all state telecommunications equipment distribution programs. TEDPA, Find a State Program, https://www.tedpa.com/state-programs (last visited Aug. 21, 2025).

[159] CommunicationFIRST Comments at 5-6; *see* California Connect, *Communicate Your Way*, https://caconnect.org/about/ (last visited Aug. 21, 2025). *See also* Missouri PSC Comments at 2 (Missouri's Relay Missouri Fund financially supports a program that distributes specialized equipment to residents with disabilities who are unable to use traditional telecommunications equipment).

68. Beyond these, states have pursued other specialized services and initiatives funded from their intrastate TRS funds. Missouri, for instance, added Relay Conference Captioning (RCC) service, a real-time captioning solution designed specifically for conference calls and group meetings, which it funds from its intrastate Relay Missouri Fund.[160] Although the Commission does not mandate them, it has encouraged states to offer non-shared language TRS, noting that states can permissibly exceed federal mandatory minimum standards to meet the unique needs of their diverse populations.[161] Two states, Maryland and Oregon, operate Communication Facilitator (CF) services, funded from their intrastate Relay Fund, which provide equal access to telecommunications to residents who are deafblind via in-person skilled signers so that these people who are deafblind can participate in video conversations.[162]

69. These additional programs highlight how states utilize their intrastate TRS funds for equipment distribution programs and specialized services to address specific community needs. We seek comment on whether there are other types of programs or communication services, beyond those already identified, that states are considering or funding through their intrastate TRS programs to support their residents with hearing and speech disabilities. If states do not end up supporting the Internet-based forms of TRS, what is the optimal role for state relay programs and their intrastate TRS funds? We also invite comments on how the Commission can support state-specific initiatives and ensure a cohesive, efficient nationwide TRS framework as technology and user needs continue to evolve.

2. Temporarily Certifying an Analog Relay Provider on a National Basis

70. To ensure the continued availability of TRS to those users who may still be served by analog telephone facilities, we seek comment on whether to establish a temporary national certification process for providers of TTY Relay and STS. Should a national certification process for TTY Relay and STS providers mirror the federal certification framework already in place for Internet-based forms of TRS.[163] We believe such an approach would help ensure that the diminishing number of users still served by copper facilities are not left without recourse if the state chooses to discontinue the provision of TTY Relay or terminates its TRS program before all users in the state have access to Internet-based forms of TRS. We seek comment on that belief. Are there other approaches the Commission should consider to ensure continued access to TRS services during network transitions? Should we establish a sunset for the national certification process? What factors should we consider in establishing a sunset? Should it be date specific or should we rely on specific events occurring, such as no TTY Relay use over a one-year period? If the sunset should be dependent on specific events occurring, what events should we consider?

71. Under this approach, grant of certification would allow the certified provider to provide TRS in any state that ends its provision of TTY Relay or discontinues its TRS program. If more than one application for certification is received, we seek comment on whether the Commission should grant a

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[160] Missouri PSC Comments at 2.

[161] *Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities*, CC Docket Nos. 90-571, 98-67, CG Docket No. 03-123, Report and Order, Order on Reconsideration, and Further Notice of Proposed Rulemaking, 19 FCC Rcd 12475, 12504-05, para. 61 (2004) (*2004 TRS Cost Recovery Order*) (recognizing that states may "tailor intrastate TRS to meet the needs of their citizenry while meeting, or exceeding the Commission's minimum standards"); *Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities*, CC Docket No. 98-67, CG Docket No. 03-123, Order on Reconsideration, 20 FCC Rcd 13140, 13148, para. 15 (2005) (giving an example of a state TRS service that permissibly exceeds the mandatory minimum standards).

[162] Maryland Relay, *Communication Facilitator (CF) Service*, https://mdrelay.maryland.gov/Pages/CommunicationFacilitatorService.aspx (last visited Aug. 21, 2025); Oregon Public Utility Commission, *Bridges Oregon to Offer New Program for DeafBlind Oregonians* (Dec. 13, 2022), https://www.oregon.gov/puc/news-events/Documents/PR-202225.pdf. Several additional states offer or are in the process of setting up CF services, funded from sources other than their intrastate Relay Funds.

[163] *2000 TRS Order*, 15 FCC Rcd at 5154-56, paras. 22-27; *2002 IP Relay Declaratory Ruling*, 17 FCC Rcd at 7784-87, paras. 15-26; *2006 IP CTS Declaratory Ruling*, 22 FCC Rcd at 390, para. 25.

national certification to a single applicant or multiple applicants. If we grant a certification to only one entity, what factors should the Commission consider in granting that certification? What weight should it assign the various factors? How should service continuity be ensured in states where current contracts expire or are terminated, and what coordination mechanisms would be necessary between state agencies and the national provider(s)? Alternatively, should the Commission manage the underlying 8XX telephone number associated with 711 in each state? What steps would the Commission need to take to be able to obtain, hold, and assign the relevant, underlying 8XX telephone number(s) for TTY Relay within a state?[164] If we approved multiple national providers, would we be able to maintain the 711 calling structures? Could consumers be afforded the opportunity to choose a provider when dialing 711? What are the costs and benefits of establishing national certification for TTY Relay? For STS? Would adopting such a national certification process allow us to lift the mandatory status for STS, allowing states to transition away from analog forms of TRS without surrendering the certification for their entire TRS program?

72. We also seek comment on whether to require any nationally certified analog relay provider(s) to provide CTS in addition to TTY Relay and STS. Would requiring the provision of all three forms of analog relay service better ensure that intrastate and interstate TRS are available nationwide to the extent possible, and in the most efficient manner?[165]

73. We propose that nationally certified relay provider(s) be compensated from the Interstate TRS Fund, where it is providing service in a state that has discontinued its TRS program or does not support the provided forms of TRS. This approach aligns with the established funding mechanism for IP Relay, VRS, and IP CTS, which are entirely supported through TRS Fund contributions based on interstate and intrastate revenue.[166] We seek comment on this proposal. We also invite comment on how the jurisdictional separation of costs between intrastate and interstate funds would work in practice, where the TRS Fund would reimburse the nationally certified provider for both its intrastate and interstate minutes of TRS, and state-contracted providers for only their interstate minutes. Would such a change unduly burden the calculation of the relevant contribution factor? We also seek comment on the potential costs and benefits of such a funding model on both the TRS Fund and state-administered funds.

3. Extending User Registration and Verification Requirements

74. While Internet-based TRS users are subject to various registration and verification requirements, analog TRS, such as TTY Relay, CTS, and STS, currently lack comparable mandated user registration and centralized verification processes. To further strengthen the integrity and oversight of the entire TRS program and build upon the recognized benefits of a user registration database, we propose to extend comprehensive user registration and verification requirements to all forms of TRS, including these analog services and any future Internet-based forms of TRS. This expansion is crucial to ensuring that all services supported by the TRS Fund operate with enhanced accountability and to combat waste, fraud, and abuse program-wide. Such a measure would allow the Commission to gather complete and accurate data on service demand and utilization across the entire TRS landscape. We seek comprehensive comment on the feasibility, costs, and benefits of extending user registration and verification requirements to all forms of TRS. Commenters should detail any unique technical or operational challenges for specific services (e.g., TTY Relay, STS, CTS, or IP Relay, or proposed IP STS and RTT-based relay service), and identify the specific types of data that would be most relevant and least burdensome for the providers to collect and submit. We also solicit input on how current user registration

[164] *See* FCC, *TRS by State and Territories*, https://www.fcc.gov/general/trs-state-and-territories (last visited Aug. 18, 2025) (listing each state relay program and underlying 8XX telephone number for reaching each analog relay service provided in the state).

[165] 47 U.S.C. § 225(b)(1).

[166] *2000 TRS Order*, 15 FCC Rcd at 5154-56, paras. 22-27; *2002 IP Relay Declaratory Ruling*, 17 FCC Rcd at 7784-87, paras. 15-26; *2006 IP CTS Declaratory Ruling*, 22 FCC Rcd at 390, para. 25.

data elements might apply or need modification for these services, and the timeframe for implementation.

75. In the alternative, we seek comment on codifying and extending the current IP Relay registration requirements to analog TRS and the proposed services of IP STS and RTT-based relay service. Specifically, we seek comment on codifying a "reasonable means of verifying" and "consumer education and outreach efforts" requirements into our general TRS user registration and verification rules. This would explicitly require providers to implement a reasonable and not unduly burdensome means of verifying user registration and eligibility, alongside consumer education and outreach efforts on the importance of accurate registration. We seek comment on the appropriateness, feasibility, and potential impact of codifying these specific requirements, including the costs and benefits of applying them uniformly IP Relay, TTY Relay, STS, CTS, and the proposed IP STS and RTT-based relay service.

76. We also seek comment and supporting data on the various ways individuals currently sign up for service, such as through an in-person representative, a remote conversation with a CA, or a purely electronic application with no human interaction. Should we codify one or more of these proven methods, conducting in-person or on-camera ID checks, as a safe harbor for identification verification? We invite commenters to provide specific data on the efficacy, costs, and benefits associated with different sign-up and verification methods, including the rate of successful verification and user experience. We also invite comments on the safe harbor method for identification verification and whether another method would be more effective as a safe harbor.

4. Call Detail Records

77. TRS providers seeking compensation from the TRS Fund must submit Call Detail Records (CDRs) to the TRS Fund administrator for each call for which compensation is sought.[167] The data submission requirements are designed to ensure effective oversight, fund administration, and accountability, and to help enable the determination of a TRS Fund budget for each service, as well as the determination of provider compensation rates. The call data TRS providers are required to submit includes the call record ID sequence, CA ID number, session start and end times, conversation start and end times, incoming and outbound telephone numbers (when appropriate) and IP addresses (when appropriate), total conversation minutes, total session minutes, the call center or home workstation, and the URL address through which the call is initiated. In addition, VRS call data must identify each video conference in which integrated VRS is provided.[168] The Commission relies on comprehensive CDR data to facilitate a more complete and accurate understanding of service demand, costs, and utilization across the entire TRS landscape.

78. To further enhance the integrity and ensure consistent oversight across the entire TRS program, we propose that all TRS providers, including those offering traditional analog services as well as any future forms of TRS, such as IP STS and RTT-based relay service, submit comprehensive CDRs to the TRS Fund administrator for intrastate and interstate TRS calls and minutes, whether or not providers are currently compensated for those minutes from the TRS Fund. This measure would strengthen the Commission's ability to combat waste, fraud, and abuse, ensuring that all services supported by the TRS Fund operate with enhanced accountability. We seek comment on the feasibility, costs, and benefits of clarifying that all TRS providers must meet these CDR requirements, detailing any unique technical or operational challenges for specific services that receive compensation from state TRS programs. Commenters should address the specific types of data that would be most relevant and least burdensome for analog services to collect and submit, how the current CDR data elements (e.g., minutes of use, unique identifiers, speed of answer) might apply or need modification for these services, and the timeframe for implementation.

79. To help us evaluate the efficacy and appropriateness of our existing regulatory frameworks, we also seek comment on whether any of the current CDR requirements can be modified or

[167] 47 CFR § 64.604(c)(5)(iii)(D)(2).

[168] *Id*. § 64.604(c)(5)(iii)(D)(2)(i)-(x), (c)(5)(iii)(D)(3), (c)(5)(iii)(D)(9).

eliminated to reduce administrative burden on providers and the TRS Fund administrator, without compromising program integrity or the Commission's oversight capabilities. Commenters should identify specific CDR elements that they believe are redundant, obsolete, or impose an unduly burdensome collection effort, and propose alternative data points or methodologies that could achieve the same regulatory objectives more efficiently. Are some categories of call data inapplicable or unnecessary for certain types of TRS? Are there additional categories of call data that should be collected for certain types of TRS? We also seek comment on whether the current granularity of detail required for specific call types, such as integrated VRS in video conferences, is appropriate, or if a more streamlined approach could be adopted.

F. Updating or Deleting Obsolete or Unnecessary Rules

80. As part of our effort to modernize the TRS program, we propose to update the TRS rules by deleting or modifying regulations that are obsolete or otherwise burdensome and unnecessary. We seek comment on these proposals and the questions, beliefs, and assumptions stated below.

81. *Employee trainings*. Section 64.604(a)(1)(i) places a requirement on TRS providers to ensure "all CAs be sufficiently trained to effectively meet the specialized communications needs of individuals with hearing and speech disabilities."[169] We propose to delete the phrase "be sufficiently trained to," giving providers more flexibility to ensure CAs effectively meet the specialized communications needs of individuals with hearing and speech disabilities.[170]

82. *Best efforts*. Section 64.604(a)(1)(vi) requires TRS providers to "make best efforts to accommodate a TRS user's requested CA gender when a call is initiated and, if a transfer occurs, at the time the call is transferred to another CA."[171] We propose to delete this rule. We encourage TRS providers to accommodate such requests, as fulfilling such requests may provide a more natural call experience and reduce the number of abandoned TRS calls. However, "best efforts" obligations are inherently difficult to enforce. Further, we believe TRS providers have a built-in financial incentive to attempt to fulfill user preferences to avoid that user changing to another provider or from the user disconnecting and reconnecting to attempt to find a CA with specific attributes.

83. *Obsoletion*. Section 64.604 (a)(3)(iii) allows TRS providers to decline to complete a call because credit authorization is denied.[172] We propose to delete this rule, as we do not believe credit authorization is currently an issue for TRS calls. In the last five years, have TRS providers ever declined to complete a call because credit authorization is denied? If so, what is the frequency of such occurrences? What is the cost to a provider to complete a call where credit authorization is denied?

84. Section 64.604(a)(3)(iv) requires analog TRS (TTY Relay, STS, and CTS) to be capable of handling pay-per-call calls.[173] We propose to delete this rule. We believe the use of pay-per-call (900) calls is no longer sufficiently prevalent in the United States to warrant an explicit rule requiring TRS providers to support that type of call. We also note that, with or without a specific pay-per-call provision, TRS providers remain subject to the general requirement that they "be capable of handling any type of call normally provided by telecommunications carriers unless the Commission determines that it is not technologically feasible to do so."[174] Is it still technologically feasible to complete 900 number calls using analog TRS? What are the costs and benefits of retaining a specific requirement, given that the general types-of-call provision would still require pay-per-call calls to be handled if "normally provided"

[169] *Id.* § 64.604(a)(1)(i).

[170] *Id.*

[171] *Id.* § 64.604(a)(1)(vi).

[172] *Id.* § 64.604(a)(3)(iii).

[173] *Id.* § 64.604(a)(3)(iv).

[174] *Id.* § 64.604(a)(3)(ii).

and technologically feasible?

85. Section 64.604(a)(3)(v) requires TRS providers to provide specific types of TRS calls, such as text-to-voice and voice-to-text, one-line voice carry over (VCO), two-line VCO, VCO-to-TTY, and VCO-to-VCO, one-line hearing carry over (HCO), two-line HCO, HCO-to-TTY, and HCO-to-HCO. The rule also exempts Internet-based TRS providers from some of these requirements.[175] We seek comment on whether updates to this provision are needed. Are there types of TRS calls or functionality that should be added to or deleted from the list?

86. Section 64.604(b)(2)(ii)(E) requires a local exchange carrier (LEC), "upon request," to "provide the call attempt rates and the rates of calls blocked between the LEC and the TRS facility to relay administrators and TRS providers."[176] We propose to delete this requirement. When the Commission adopted this requirement it also required TRS relay centers to be designed to a P.01 standard, a network design standard used to ensure that no more than one percent of calls at the busiest hour of the day are unable to be delivered to the relay network due to inadequate facilities.[177] In combination with the speed of answer requirement, the Commission could ensure that placing a call using TTY Relay was functionally equivalent to hearing user placing a voice call. We believe that in meeting these network design standards and measuring a TRS's providers speed of answer, it is no longer necessary to maintain an explicit rule for a LEC that serves the TRS center to provide call attempt rates and the rates of blocked calls between the LEC and the relay center upon the request of relay administrators and TRS providers. We seek comment on this belief.

87. Section 64.604(b)(4)(i) incorporates the statutory requirement that relay services must "operate every day, 24 hours a day."[178] However, the rule exempts relay services (other than VRS) from this requirement, if they "are not mandated by this Commission."[179] As a result, TTY Relay and STS, as "mandatory" services, are required to operate 24/7, as is VRS, while other "non-mandatory" services—IP Relay, IP CTS, and analog CTS—are exempt from this requirement. While such differential application of the 24/7 requirement may have been justified on an interim basis, when the exempt services were still in the experimental stage, we do not believe that the exemption reflects the current operating practices of the providers of non-mandated relay service. Further, we do not believe that the exemption aligns with users' current expectations regarding these relay services. Therefore, we propose to delete this language and require all forms of TRS to operate every day, 24 hours a day. Adopting this change would bring this rule into alignment with the statutory requirement that TRS operate every day for 24 hours per day.[180] Are there any current forms of TRS, or variants thereof, for which 24/7 operation would be economically burdensome without increased TRS Fund support? What would be the costs and benefits of continuing to exempt such services?

88. Section 64.604(b)(5) states that "[n]o regulation set forth in this subpart is intended to discourage or impair the development of improved technology that fosters the availability of telecommunications to person with disabilities."[181] In addition, section 64.604(b)(5) explicitly permits TRS facilities to "use SS7 technology or any other type of similar technology to enhance the functional equivalency and quality of TRS" and provides that facilities that use SS7 technology are subject to the

[175] *Id.* § 64.604(a)(3)(v).

[176] *Id.* § 64.604(b)(2)(ii)(E). Relay administrators in this instance refers to the state TRS programs.

[177] *2000 TRS Order*, 15 FCC Rcd at 5167-68, para. 65.

[178] 47 CFR § 64.604(b)(4)(i); 47 U.S.C. § 225(d)(1)(C).

[179] 47 CFR § 64.604(b)(4)(i).

[180] 47 U.S.C. § 225(d)(1)(C).

[181] 47 CFR § 64.604(b)(5).

Calling Party Telephone Number rules.[182] We propose to delete this provision in its entirety. The statement that the TRS regulations "are not intended to discourage or impair the development of improved technology" refers to the statutory directive to the Commission to "ensure that regulations prescribed to implement this section encourage, consistent with section 157(a) of this title, the use of existing technology and do not discourage or impair the development of improved technology."[183] This statutory directive applies regardless of any disclaimer in our rules. Thus, it appears that the disclaimer in our rules serves no purpose. As for the statements regarding SS7 technology, they too appear to be mere surplusage. Without this language, we believe such technology would still be permitted for use and that the Calling Telephone Number rules would continue to apply where SS7 is used. As such, retention of this provision appears unnecessary.

G. Closing CG Docket No. 08-15

89. We seek comment on closing CG Docket Nos. 08-15, Speech-to-Speech and Internet Protocol (IP) Speech-to-Speech Telecommunications Relay Services. This docket has been inactive for at least a decade. Furthermore, the Commission conducted proceedings in this docket in parallel with CG Docket No. 03-123. In seeking to develop a fresh record on STS, IP STS, and video-assisted STS, we do not see a need to maintain a separate duplicative record, and we believe closing the docket eliminates a duplicative filing requirements that unnecessarily burden commenters. We seek comment on this belief. The only comments that should be filed in CG Docket No. 08-15 should be those comments raising concerns with closing CG Docket No. 08-15. Comments on all other matters in this proceeding should be filed in CG Docket No. 03-123.

IV. PROCEDURAL MATTERS

90. *Filing Requirements*. Pursuant to sections 1.415 and 1.419 of the Commission's rules, 47 CFR §§ 1.415, 1.419, interested parties may file comments and reply comments on or before the dates indicated on the first page of this document. 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.
- 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.

91. *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 or call the Consumer & Governmental Affairs Bureau at 202-418-0530 (voice).

[182] *Id.*

[183] 47 U.S.C. § 225(d)(2).

92. *Ex Parte Rules*. The proceeding this Notice initiates shall be treated as a "permit-but-disclose" proceeding in accordance with the Commission's *ex parte* rules.[184] 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 section 1.1206(b) of the Commission's rules. In proceedings governed by section 1.49(f) of the rules 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).[185] Participants in this proceeding should familiarize themselves with the Commission's *ex parte* rules.

93. *Regulatory Flexibility Act*. The Regulatory Flexibility Act of 1980, as amended (RFA),[186] requires that an agency prepare a regulatory flexibility analysis for notice-and-comment rulemaking proceedings, unless the agency certifies that "the rule will not, if promulgated, have a significant economic impact on a substantial number of small entities."[187] Accordingly, the Commission has prepared an Initial Regulatory Flexibility Analysis (IRFA), concerning potential rule and policy changes contained in this Notice. The IRFA is set forth in Appendix B. The Commission invites the general public, in particular small businesses, to comment on the IRFA. Comments must be filed by the deadlines for comments on the Notice indicated on the first page of this document, and must also have a separate and distinct heading designating them as responses to the IRFA.

94. *Paperwork Reduction Act Analysis*. This document may contain proposed new or modified information collections. The Commission, as part of its continuing effort to reduce paperwork burdens, invites the general public and the Office of Management and Budget (OMB) to comment on any information collections contained in this document, as required by the Paperwork Reduction Act of 1995, 44 U.S.C. §§ 3501-3521.[188] In addition, pursuant to the Small Business Paperwork Relief Act of 2002, we seek specific comment on how we might further reduce the information collection burden for small business concerns with fewer than 25 employees.[189]

95. *Providing Accountability Through Transparency Act.* Consistent with the Providing Accountability Through Transparency Act, Public Law 118-9,, a summary of this Notice of Proposed Rulemaking will be available on https://www.fcc.gov/proposed-rulemakings.

96. *Further Information*. For further information about this proceeding, contact Michael Scott, CGB, Disability Rights Office, (202) 418-1264, e-mail Michael.Scott@fcc.gov.

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[184] *See* 47 CFR §§ 1.1200 *et seq*.

[185] *Id*. § 1.1206(b).

[186] 5 U.S.C. §§ 601 *et seq*., as amended by the Small Business Regulatory Enforcement and Fairness Act (SBREFA), Pub. L. No. 104-121, 110 Stat. 847 (1996).

[187] *Id.* § 605(b).

[188] 44 U.S.C. §§ 3501-3521.

[189] *Id.* § 3506(c)(4).

V. ORDERING CLAUSES

97. Accordingly, IT IS ORDERED that, pursuant to sections 1, 2, 4(i), (4)(j), and 225 of the Communications Act of 1934, as amended, 47 U.S.C. §§ 151, 152, 154(i), 154(j), 225, this Notice of Proposed Rulemaking IS ADOPTED. [190]

98. IT IS FURTHER ORDERED that, pursuant to applicable procedures set forth in sections 1.415 and 1.419 of the Commission's Rules, 47 CFR §§ 1.415, 1.419, interested parties may file comments on the Notice of Proposed Rulemaking on or before 30 days after publication in the Federal Register, and reply comments on or before 60 days after publication in the Federal Register.

99. IT IS FURTHER ORDERED that the Commission's Office of the Secretary, SHALL SEND a copy of this Notice of Proposed Rulemaking, including the Initial Regulatory Flexibility Analysis, to the Chief Counsel for the Small Business Administration (SBA) Office of Advocacy.

FEDERAL COMMUNICATIONS COMMISSION

Marlene H. Dortch
Secretary

[190] Pursuant to Executive Order 14215, 90 Fed. Reg. 10447 (Feb. 20, 2025), this regulatory action has been determined to be not significant under Executive Order 12866, 58 Fed. Reg. 68708 (Dec. 28, 1993).

APPENDIX A
PROPOSED RULES

Deleted text is marked with a ~~strikethrough~~.

The Federal Communications Commission proposes to amend 47 CFR part 64 as follows:

PART 64 – Miscellaneous Rules Relating to Common Carriers

1. The authority for part 64 continues to read as follows:

AUTHORITY: 47 U.S.C. §§ 151, 152, 154, 201, 202, 217, 218, 220, 222, 225, 226, 227, 227b, 228, 251(a), 251(e), 254(k), 255, 262, 276, 403(b)(2)(B), (c), 616, 620, 716, 1401-1473, unless otherwise noted; Pub. L. 115-141, Div. P, sec. 503, 132 Stat. 348, 1091; Pub. L. 117-338, 136 Stat. 6156.

2. Amend § 64.604 as follows:

   a. revise paragraphs (a)(1)(i), and (b)(4)(i);

   b. remove and reserve paragraphs (a)(1)(vi), (a)(3)(iii), (a)(3)(iv), (b)(2)(ii)(E), and (b)(5).

(a) * * *

(1) * * *

(i) TRS providers are responsible for requiring that all CAs ~~be sufficiently trained to~~ effectively meet the specialized communications needs of individuals with hearing and speech disabilities.

* * * * *

(vi) [Reserved]

* * * * *

(3) * * *

(iii) [Reserved]

(iv) [Reserved]

* * * * *

(b) * * *

(2) * * *

(ii) * * *

(E) [Reserved]

* * * * *

(4) * * *

(i) TRS shall operate every day, 24 hours a day. ~~Relay services that are not mandated by this Commission need not be provided every day, 24 hours a day, except VRS.~~

* * * * *

(5) [Reserved]

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Appendix B
Initial Regulatory Flexibility Analysis

1. As required by the Regulatory Flexibility Act of 1980, as amended (RFA),[1] the Federal Communications Commission (Commission) has prepared this Initial Regulatory Flexibility Analysis (IRFA) of the policies and rules proposed in the *Notice of Proposed Rulemaking* (*Notice*) assessing the possible significant economic impact on a substantial number of small entities. The Commission requests written public comments on this IRFA. Comments must be identified as responses to the IRFA and must be filed by the deadlines for comments specified on the first page of the *Notice*. The Commission will send a copy of the *Notice*, including this IRFA, to the Chief Counsel for the Small Business Administration (SBA) Office of Advocacy.[2] In addition, the *Notice* and IRFA (or summaries thereof) will be published in the Federal Register.[3]

A. Need for, and Objectives of, the Proposed Rules

2. In the *Notice*, the Commission proposes to phase out mandatory support for text telephone (TTY)-based relay service, permit state Telecommunication Relay Services (TRS) programs more flexibility to manage their programs, facilitate the transition from outdated analog forms of TRS to Internet-based forms of TRS and other accessible forms of modern communications, streamline eligibility, registration, verification, and data collection requirements, and update or delete obsolete rules. As communications technologies have evolved, analog TRS have seen declining or minimal usage. The Commission proposes these changes to align TRS with modern communications landscape and improve access and service for users of relay service in order to meet its statutory obligation to ensure that TRS are available, "to the extent possible and in the most efficient manner," to individuals with hearing or speech disabilities in the United States.[4] The Commission also seeks to ensure that all forms of TRS are used appropriately and efficiently, and to safeguard the TRS Fund from waste, fraud, and abuse.

B. Legal Basis

3. The proposed action is authorized pursuant to sections 1, 2, 4(i), (4)(j), and 225 of the Communications Act of 1934, as amended, 47 U.S.C. §§ 151, 152, 154(i), 154(j), 225.

C. Description and Estimate of the Number of Small Entities to Which the Proposed Rules will Apply

4. The RFA directs agencies to provide a description of and, where feasible, an estimate of the number of small entities that may be affected by the proposed rules, if adopted.[5] The RFA generally defines the term “small entity” as having the same meaning as the terms “small business,” “small organization,” and “small governmental jurisdiction.”[6] In addition, the term “small business” has the same meaning as the term “small business concern” under the Small Business Act (SBA).[7] A “small

[1] 5 U.S.C. §§ 601 *et seq*., as amended by the Small Business Regulatory Enforcement and Fairness Act (SBREFA), Pub. L. No. 104-121, 110 Stat. 847 (1996).

[2] *Id.* § 603(a).

[3] *Id*.

[4] 47 U.S.C. § 225(b)(1).

[5] 5 U.S.C. § 603(b)(3).

[6] *Id*. § 601(6).

[7] *Id*. § 601(3) (incorporating by reference the definition of “small-business concern” in the Small Business Act, 15 U.S.C. § 632). Pursuant to 5 U.S.C. § 601(3), the statutory definition of a small business applies “unless an agency, after consultation with the Office of Advocacy of the Small Business Administration and after opportunity for public comment, establishes one or more definitions of such term which are appropriate to the activities of the agency and publishes such definition(s) in the Federal Register.”

business concern" is one which: (1) is independently owned and operated; (2) is not dominant in its field of operation; and (3) satisfies any additional criteria established by the SBA.[8] The SBA establishes small business size standards that agencies are required to use when promulgating regulations relating to small businesses; agencies may establish alternative size standards for use in such programs, but must consult and obtain approval from SBA before doing so.[9]

5. Our actions, over time, may affect small entities that are not easily categorized at present. We therefore describe three broad groups of small entities that could be directly affected by our actions.[10] In general, a small business is an independent business having fewer than 500 employees.[11] These types of small businesses represent 99.9% of all businesses in the United States, which translates to 34.75 million businesses.[12] Next, "small organizations" are not-for-profit enterprises that are independently owned and operated and not dominant their field.[13] While we do not have data regarding the number of non-profits that meet that criteria, over 99 percent of nonprofits have fewer than 500 employees.[14] Finally, "small governmental jurisdictions" are defined as cities, counties, towns, townships, villages, school districts, or special districts with populations of less than fifty thousand.[15] Based on the 2022 U.S. Census of Governments data, we estimate that at least 48,724 out of 90,835 local government jurisdictions have a population of less than 50,000.[16]

6. The rules proposed in the *Notice* will apply to small entities in the industries identified in the chart below by their six-digit North American Industry Classification System (NAICS)[17] codes and corresponding SBA size standard.[18] Based on currently available U.S. Census data regarding the estimated number of small firms in each identified industry, we conclude that the proposed rules will impact a substantial number of small entities. Where available, we also provide additional information regarding the number of potentially affected entities in the industries identified below.

[8] 15 U.S.C. § 632.

[9] 13 CFR § 121.903.

[10] 5 U.S.C. § 601(3)-(6).

[11] *See* SBA, Office of Advocacy, *Frequently Asked Questions About Small Business* (July 23, 2024), https://advocacy.sba.gov/wp-content/uploads/2024/12/Frequently-Asked-Questions-About-Small-Business_2024-508.pdf.

[12] *Id*.

[13] 5 U.S.C. § 601(4).

[14] *See* SBA, Office of Advocacy, *Small Business Facts, Spotlight on Nonprofits* (July 2019), https://advocacy.sba.gov/2019/07/25/small-business-facts-spotlight-on-nonprofits/.

[15] 5 U.S.C. § 601(5).

[16] *See* U.S. Census Bureau, 2022 Census of Governments –Organization, https://www.census.gov/data/tables/2022/econ/gus/2022-governments.html, tables 1-11.

[17] The North American Industry Classification System (NAICS) is the standard used by Federal statistical agencies in classifying business establishments for the purpose of collecting, analyzing, and publishing statistical data related to the U.S. business economy. *See* www.census.gov/NAICS for further details regarding the NAICS codes identified in this chart.

[18] The size standards in this chart are set forth in 13 CFR 121.201, by six digit North American Industrial Classification System (NAICS) code.

Regulated Industry (NAICS Classification)	NAICS Code	SBA Size Standard	Total Firms[19]	Small Firms[20]	% Small Firms in Industry
All Other Telecommunications[21]	517810	$40 million	1,673	1,007	60.19%

D. Description of Economic Impact and Projected Reporting, Recordkeeping, and Other Compliance Requirements for Small Entities

7. The RFA directs agencies to describe the economic impact of proposed rules on small entities, as well as projected reporting, recordkeeping and other compliance requirements, including an estimate of the classes of small entities which will be subject to the requirements and the type of professional skills necessary for preparation of the report or record.[22]

8. The changes proposed in the *Notice*, if adopted, could impose new or modified reporting, recordkeeping, or other compliance obligations on certain small entities that provide TTY-based relay service, Speech-to-Speech relay services (STS), Captioned Telephone Service (CTS), or seek to provide Internet Protocol (IP) STS or Real-Time Text (RTT)-based relay service. The Commission proposes to make clear the applicability of its call data collection requirements to all forms of TRS to help the TRS Fund administrator verify the validity of submitted minutes of use and seeks comments on any modifications to the call data requirements to ensure collection of appropriate data for each service and avoid unnecessarily burdening small entities. The Commission also seeks comment on streamlining and unifying the applicability of user eligibility, registration, and verification rules to safeguard the TRS program. This could include the collection and verification of user identity and location information, as well as, eligibility certifications. The Commission seeks comment on the specific process that should be utilized for each form of TRS, including the type of documentation or assessment required to confirm eligibility, and how to balance ease of access for legitimate users with robust protections against misuse. The information we receive in comments will help the Commission identify and evaluate relevant compliance matters, costs, and other burdens for small entities that may result from the proposals and inquiries made in the *Notice*.

E. Discussion of Significant Alternatives Considered That Minimize the Significant Economic Impact on Small Entities

9. The RFA directs agencies to provide a description of any significant alternatives to the proposed rules that would accomplish the stated objectives of applicable statutes, and minimize any significant economic impact on small entities.[23] The discussion is required to include alternatives such as: "(1) the establishment of differing compliance or reporting requirements or timetables that take into account the resources available to small entities; (2) the clarification, consolidation, or simplification of compliance and reporting requirements under the rule for such small entities; (3) the use of performance rather than design standards; and (4) an exemption from coverage of the rule, or any part thereof, for such small entities."[24]

[19] *See* U.S. Census Bureau, *2017 Economic Census of the United States*, *Employment Size of Firms for the U.S.: 2017,* Table ID: EC1700SIZEEMPFIRM, and *2017 Economic Census of the United States*, *Selected Sectors: Sales, Value of Shipments, or Revenue Size of Firms for the U.S.: 2017,* Table ID: EC1700SIZEREVFIRM.

[20] *Id.*

[21] Affected Entities in this industry Telecommunications Relay Services (TRS) Providers.

[22] 5 U.S.C. § 603(b)(4).

[23] *Id.* § 603(c).

[24] *Id.* § 603(c)(1)-(4).

10. The proposed changes to the Commission's TRS rules are designed to align the Commission's TRS program and state TRS programs with modern communications services and better serve the needs of relay users. The Commission seeks to alleviate the burden to state TRS programs and analog TRS providers to continue to support and maintain outdated forms of TRS that are becoming more difficult to provide and support over IP-based communication networks. To facilitate this process, while minimizing the economic impact to small entities, the Commission inquiries on an appropriate process for transitioning analog TRS users, plans and timelines for changes to state TRS program, maintaining support for analog forms of TRS during the transition period, introducing comparable, modern forms of TRS, and aligning and right sizing requirements for registering and verifying TRS users and collecting call detail records. The item also inquiries about reducing burdens through updating or deleting obsolete or unnecessarily burdensome rules.

11. The *Notice* seeks comment from all interested parties, particularly those of small business entities. Small entities are encouraged to bring to the Commission's attention any specific concerns they may have with the proposals outlined in the *Notice* and outline any suggested alternatives. The Commission expects to consider the economic impact on small entities, as identified in comments filed in response to the *Notice*, in reaching its final conclusions and taking action in this proceeding.

F. Federal Rules that May Duplicate, Overlap, or Conflict with the Proposed Rules

12. None.