STATEMENT OF
COMMISSIONER GEOFFREY STARKS

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

The FCC has twin obligations when it comes to telecommunications relay services ("TRS"). First, and most important, we are charged with ensuring that those who are deaf, hard of hearing, deafblind, or who have speech disabilities can communicate in a manner that is functionally equivalent to those without such disabilities. Second, we must be good stewards of the funds used to provide these services, and ensure that they are only used for this critical purpose.

Today's action continues our important work of fulfilling our second obligation, by asking whether different rates should be applied to internet protocol captioned telephone service ("IP CTS") when the service is provided by an individual communications assistant, as opposed to on a fully automated basis, by automated speech recognition ("ASR"). But asking these questions necessarily raises the issue of the functional equivalence of each of these options. In particular, I still remain concerned about potential algorithmic bias in ASR. As I first raised more than two years ago, studies have shown that speech recognition systems make far more errors when transcribing the speech of people of color than of their white counterparts.[1] I thank the Chairwoman for agreeing to my edits referencing this issue in today's item.

Earlier this month, I was privileged to visit a video relay service ("VRS") call center outside of Washington, D.C. Individuals who communicate using sign language use VRS—another form of TRS— every day to have the phone calls that many take for granted. One of the people I spoke to recalled how the technology opened doors for him, and enabled him to go after goals and dreams that had previously seemed out of reach. I often speak about the importance of ensuring that all Americans are connected in today's technological world. This is no different. We must continue to improve and support all forms of TRS, including IP CTS and VRS, because unequal communications services should not stand in the way of anyone's goals.

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[1] *See* Allison Koenecke et al., "Racial disparities in automated speech recognition," Proceedings of the National Academy of Sciences Vol. 117 No. 14 (2020), https://www.pnas.org/doi/10.1073/pnas.1915768117 (Stanford University study of "state-of-the-art ASR systems" developed by five major tech companies and finding an average word error rate of 35% for black speakers compared to 19% for white speakers).