

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

In the Matter of	)	
	)	
Telecommunications Relay Services and Speech-	)	CG Docket No. 03-123
to-Speech Services for Individuals with Hearing	)	
and Speech Disabilities	)	
	)	
Structure and Practices of the Video Relay Service	)	CG Docket No. 10-51
Program	)	
	)	
Misuse of Internet Protocol Relay Service	)	CG Docket No. 12-38
	)	

NOTICE OF PROPOSED RULEMAKING

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By the Commission: Chairman Carr and Commissioners Gomez and Trusty issuing separate statements.

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## I. INTRODUCTION

1. The continual evolution of communication platforms necessitates periodic, proactive re-evaluation of existing rules. Telecommunications Relay Services (TRS) rules are no exception. Changes in communications technology continue to reshape the TRS landscape, requiring us to re-examine existing regulations with the objective of improving service quality, increasing efficiency, and removing unnecessary regulation. In this Notice of Proposed Rulemaking (Notice), the Federal Communications Commission (Commission) proposes measures to secure the viability and enhance the effectiveness and functional equivalency of Internet-based TRS. This proceeding proposes targeted reforms that align Internet-based TRS with twenty-first century technological advancements in relay services that can better serve the needs of persons with disabilities.

2. We propose specific enhancements for Internet Protocol (IP) Relay and Video Relay Services (VRS), along with administrative reforms to streamline the TRS program. For IP Relay, our proposals address the use of automatic speech recognition (ASR) for speech-to-text conversion and advanced text-to-speech technologies, the need for metrics for IP Relay quality, and compatibility of IP Relay with Real-Time Text (RTT) technology. We propose to enhance VRS functionality by adding captioning functionality to VRS platforms, amend VRS calling rules for calls to U.S. embassies and consulates by U.S. residents while traveling abroad, and adjust call center requirements. Finally, we propose to streamline TRS provider certification and user registration processes, update or eliminate obsolete rules, and close outdated dockets.

## II. BACKGROUND

### A. Internet-Based Telecommunication Relay Services

3. Title IV of the Americans with Disabilities Act of 1990 (ADA), codified at section 225 of the Communications Act of 1934, as amended (the Act), established the foundation for the nationwide TRS program.<sup>1</sup> 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 communicate with one or more individuals, in a manner that is functionally equivalent to the ability of a person without such disabilities to communicate using voice communications services.<sup>2</sup> Section 225 directs the Commission to ensure that TRS are available “to the extent possible and in the most efficient manner” to people with hearing and speech disabilities in the United States.<sup>3</sup> To support the availability of TRS, the Commission established the Interstate Telecommunications Relay Services Fund (TRS Fund), which is funded by contributions from telecommunications and VoIP service providers.<sup>4</sup>

4. Initially, the TRS program focused on circuit-switched, or “analog” services, such as Text Telephone (TTY)-based Relay Service, in which a Communications Assistant (CA) converted voice to text and text to voice, enabling telephone communication by consumers who used TTYs connected to

<sup>1</sup> See Americans with Disabilities Act, Pub. L. No. 101-336, § 401, 104 Stat. 327, 336-69 (1990); 47 U.S.C. § 225.

<sup>2</sup> 47 U.S.C. § 225(a)(3).

<sup>3</sup> 47 U.S.C. § 225(a)(3), (b)(1).

<sup>4</sup> 47 CFR § 64.604(c)(5)(iii).

the Public Switched Telephone Network (PSTN).<sup>5</sup> Beginning in the early 2000s, leveraging the growth of broadband Internet access, the Commission authorized several Internet-based forms of TRS.

5. *Video Relay Service.* In March 2000, the Commission authorized VRS,<sup>6</sup> which employs video connections to enable American Sign Language (ASL) users to make telephone calls while communicating in their primary language.<sup>7</sup> In a typical VRS call, a consumer uses a broadband video link to communicate in ASL with a CA, who voices the signed message via telephone to the hearing party and then signs the voice response back to the VRS user.

6. *VRS Program Protections.* Following the discovery of widespread fraud against the TRS Fund, including illicit schemes generating illegitimate VRS minutes and resultant criminal prosecutions, the Commission adopted regulations between 2011 and 2013 to safeguard the program's integrity and ensure efficient use of resources.<sup>8</sup> Among the initial anti-fraud measures adopted in 2011, the Commission prohibited VRS CAs from handling calls at home workstations<sup>9</sup> and prohibited VRS providers from entering into contracts for interpretation or call center functions with entities not certified by the Commission.<sup>10</sup> The Commission also prohibited TRS Fund compensation for VRS calls originating in foreign countries, except for calls placed to the United States by VRS users traveling abroad if the user notified their default VRS provider of their travel before leaving the United States.<sup>11</sup>

7. In recent years, the Commission has refined its rules to better target and prevent potential fraud while allowing for additional operational flexibilities. For example, in the *2023 VRS Improvements Order*, the Commission revised the international calling restrictions,<sup>12</sup> removing the pre-departure notification requirement and allowing users to place calls to the United States while traveling abroad for up to one year, provided they notify their default VRS provider of their travel prior to placing such calls.<sup>13</sup>

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<sup>5</sup> 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).

<sup>6</sup> *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, para. 22 (2000) (*2000 VRS Order*).

<sup>7</sup> 47 CFR § 64.601(a)(57).

<sup>8</sup> *Structure and Practices of the Video Relay Service Program*, CG Docket No. 10-51, Report and Order and Further Notice of Proposed Rulemaking, 26 FCC Rcd 5545, 5546, para. 1 (2011) (*2011 VRS Call Practices Order*); *Structure and Practices of the Video Relay Service Program; Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities*, 10-51, 03-123, Report and Order and Further Notice of Proposed Rulemaking, 28 FCC Rcd 8618, 8647-56, paras. 62-86 (2013), *aff'd in part and vacated in part*, *Sorenson Communications, LLC v. FCC*, 765 F.3d 37 (2014) (*2013 VRS Reform Order*).

<sup>9</sup> *2011 VRS Call Practices Order*, 26 FCC Rcd at 5556-59, paras. 16-20; 47 CFR § 64.604(d)(7).

<sup>10</sup> *2011 VRS Call Practices Order*, 26 FCC Rcd at 5574, para. 58; 47 CFR § 64.604(d)(1)(iii).

<sup>11</sup> *2011 VRS Call Practices Order*, 26 FCC Rcd at 5564, para. 32; 47 CFR § 64.604(d)(6). *See also Structure and Practices of the Video Relay Service Program*, CG Docket No. 10-51, Declaratory Ruling, 25 FCC Rcd 1868, 1872, para. 9 (CGB 2010) (*2010 VRS Declaratory Ruling*) (VRS calls that both originate and terminate outside of the United States are not compensable from the Fund under section 225).

<sup>12</sup> *Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities; Structure and Practices of the Video Relay Services Program; Petition for Rulemaking and Interim Waiver of Convo Communications, LLC*, CG Docket Nos. 03-123, 10-51, Report and Order and Order, 38 FCC Rcd 12750, 12763-65, paras. 32-37 (2023) (*2023 VRS Improvements Order*).

<sup>13</sup> *2023 VRS Improvements Order*, 38 FCC Rcd at 12763, paras. 32-33. While these important changes have been adopted, the specific rule amendments relating to international calls (47 CFR § 64.604(d)(6)) contain modified information collection requirements and will not become effective until the Office of Management and Budget (OMB) completes its review and a notice is published in the Federal Register announcing OMB approval and the relevant effective date.

The Commission also amended its rules to allow VRS CAs to handle calls at home workstations<sup>14</sup> with rules that allow up to 80 percent of a provider's monthly minutes to be handled at home workstations, subject to technical and personnel safeguards to minimize the risk of waste, fraud, and abuse and ensure the protection of user privacy.<sup>15</sup> The Commission also revised the limit on VRS providers contracting for interpreting services, allowing VRS providers to contract with uncertified interpreters or interpreting services for up to 30 percent of their monthly call minutes.<sup>16</sup>

8. *Internet Protocol Relay Service.* In April 2002, the Commission recognized IP Relay as a form of TRS.<sup>17</sup> IP Relay is text-based and allows an individual with a hearing or speech disability to communicate using an Internet Protocol-enabled device via the Internet, rather than relying on a TTY and the PSTN.<sup>18</sup> In a typical IP Relay call, the user transmits text via the Internet to an IP Relay provider which converts the user's text to speech for the hearing party and converts that party's speech to text for the IP Relay user.<sup>19</sup>

9. IP Relay, as well as VRS, is subject to rules designed to integrate the use of these Internet-based relay services with the North American Numbering Plan (NANP). When a consumer registers for IP Relay, a provider must assign that user, or facilitate that user's request to port-in, a NANP telephone number.<sup>20</sup> The provider must also route and deliver all of that user's inbound and outbound calls unless the user chooses to place a call with, or receives a call from an alternate provider.<sup>21</sup> IP Relay providers provision the telephone number and other needed routing information in the TRS Numbering Directory to facilitate this call routing, identify whether both callers are IP Relay users, and ensure IP Relay users can be reached by telephone numbers in the same way as voice telephone users.<sup>22</sup>

10. *Internet Protocol Captioned Telephone Service.* A third form of Internet-based TRS, Internet Protocol Captioned Telephone Service (IP CTS), was approved by the Commission in 2007.<sup>23</sup> IP CTS permits an individual who can speak but has difficulty hearing over the telephone to use an IP-

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<sup>14</sup> *Structure and Practices of the Video Relay Service Program; Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities*, CG Docket Nos. 10-51 and 03-123, Report and Order, 35 FCC Rcd 831 (2020) (*2020 VRS At-Home Call-Handling Order*); 47 CFR 64.604(d)(7).

<sup>15</sup> *2023 VRS Improvements Order*, 38 FCC Rcd at 12755, para. 11.

<sup>16</sup> *Id.* at 127610, para. 25; 47 CFR § 64.604(d)(1)(iii)(B).

<sup>17</sup> *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, 7779-80, para. 1 (2002) (*2002 IP Relay Declaratory Ruling*).

<sup>18</sup> 47 CFR § 64.601(a)(27).

<sup>19</sup> *See 2002 IP Relay Declaratory Ruling*, 17 FCC Rcd at 7780-81, paras. 3-4.

<sup>20</sup> 47 CFR § 64.611(a)(1).

<sup>21</sup> 47 CFR § 64.611(a)(2).

<sup>22</sup> 47 CFR § 64.611(c)(1) (requiring providers to provision routing information in the TRS Numbering Directory); 47 CFR § 64.613(a)(2) (designating the IP Relay user information to be maintained in the TRS Numbering Director); *see also 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, WC Docket No. 05-196, Report and Order and Further Notice of Proposed Rulemaking, 23 FCC Rcd 11591, 11592-93, para. 1 (2008) (*2008 First Numbering Directory Order*).

<sup>23</sup> *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, 387, para. 19 (2007) (*2007 IP CTS Declaratory Ruling*).

enabled device via the Internet to simultaneously listen to and read captions of what the other party is saying.<sup>24</sup> Captions are generated either with the assistance of a CA or solely through ASR technology.<sup>25</sup>

**B. Current Certification Process for Providing Internet-Based TRS**

11. The Commission's rules provide that Internet-based TRS providers must receive certification from the Commission to be eligible for TRS Fund support.<sup>26</sup> The documentation required for certification includes a detailed description of the services the applicant intends to provide, and an explanation of how they will meet each mandatory minimum standard applicable to the type of TRS offered.<sup>27</sup> Recertification applications are required at least 90 days before the expiration of a provider's current certification, which typically occurs every five years, and providers must include all required information in their recertification applications.<sup>28</sup>

12. Internet-based TRS providers, once certified, are also subject to reporting and notification requirements. For example, certified providers of VRS, IP Relay, and IP CTS are obligated to notify the Commission of any substantive changes to their TRS programs, services, and features and certify that they continue to meet the Commission's mandatory minimum standards after implementing such changes.<sup>29</sup> Furthermore, each Internet-based TRS provider must file an annual report demonstrating its continuing compliance with the mandatory minimum standards.<sup>30</sup>

**C. Current User Registration and Verification Requirements.**

13. To ensure that consumers can effectively use Internet-based TRS and to prevent waste, fraud, and abuse in the TRS program, Internet-based TRS providers are required to register their subscribers.<sup>31</sup> Different user registration requirements apply to each of the three current forms of Internet-based TRS—IP Relay, VRS, and IP CTS.<sup>32</sup>

14. IP Relay providers are required to register each user of that service and collect registration information, including the consumer's name and mailing address, before issuing a ten-digit telephone number.<sup>33</sup> In addition, IP Relay providers must "implement a reasonable means of verifying registration and eligibility information that is not unduly burdensome."<sup>34</sup> While no particular verification procedures are mandated, examples include sending a postcard to the mailing address for return,

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<sup>24</sup> 47 CFR § 64.601(a)(26).

<sup>25</sup> *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 and 03-123, Report and Order, Declaratory Ruling, Further Notice of Proposed Rulemaking, and Notice of Inquiry, 33 FCC Rcd 5800, 5827, para. 48 (2018) (*2018 IP CTS Order and Declaratory Ruling*).

<sup>26</sup> 47 CFR § 64.606.

<sup>27</sup> 47 CFR § 64.606(a)(2)(i)-(ii).

<sup>28</sup> 47 CFR § 64.606(c)(2).

<sup>29</sup> 47 CFR § 64.606(f).

<sup>30</sup> 47 CFR § 64.606(g).

<sup>31</sup> 47 CFR § 64.611.

<sup>32</sup> See 47 CFR § 64.611(a)(3)-(6) (applicable to VRS providers), 64.611(a) and (b) (applicable to VRS and IP Relay providers), and 64.611(j) (applicable to IP CTS providers).

<sup>33</sup> 47 CFR § 64.611(a).

<sup>34</sup> *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, WC Docket No. 05-196, CC Docket No. 98-67, Second Report and Order and Order on Reconsideration, 24 FCC Rcd 791, 809, para. 37 (2008) (*2008 Second TRS Numbering Order*).

conducting in-person or on-camera ID checks, or using other verification processes similar to those employed by voice telephone providers, banks, and credit card companies.<sup>35</sup>

15. More detailed rules apply to VRS and IP CTS. VRS providers must collect additional information, including the user's date of birth, the last four digits of their Social Security Number or Tribal Identification Number, and a self-certification of eligibility.<sup>36</sup> Further, in 2013, the Commission mandated the establishment of a TRS User Registration Database (User Database) to centralize user registration records and identity verification.<sup>37</sup> The User Database's core function is to ensure that TRS is provided only to registered users whose eligibility has been established and identities verified based on uniform criteria, thereby protecting the TRS Fund from waste, fraud, and abuse.<sup>38</sup> VRS user registration data must be submitted to and verified by the User Database,<sup>39</sup> and VRS providers are generally prohibited from seeking compensation for service to users who do not pass the identity verification check conducted by the User Database.<sup>40</sup> A pre-verification "grace period" allows providers to offer service to new or porting users for up to two weeks while identity verification is pending, with compensation contingent upon eventual verification.<sup>41</sup> IP CTS providers are also required to collect registration data from users, similar to that required from VRS users.<sup>42</sup> In addition, the Commission has adopted rules providing for the transmission and verification of IP CTS registration data in the User Database, subject to the same procedures applicable to VRS.<sup>43</sup> However, a notice indicating that the User Database is ready to receive IP CTS user data has not yet been published.

#### **D. Performance Metrics**

16. In 2016 and 2017, the Commission issued Notices of Inquiry seeking comment on whether and how to establish performance measures and metrics for VRS and IP CTS, respectively.<sup>44</sup> In

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<sup>35</sup> *2008 Second TRS Numbering Order*, 24 FCC Rcd at 809-10, para. 38. Such materials also should make it clear that the consumer may obtain a telephone number from, and register with, his or her provider of choice (notwithstanding any prior relationship the consumer may have had with another provider); (2) the consumer may change default providers at any time and, in doing so, retain his or her telephone number by porting the number to the new default provider; (3) the consumer may make calls through, and receive calls from, any provider (and the consumer is not limited to making or receiving calls through his or her default provider); and (4) the provider cannot condition the ongoing use or possession of equipment, or the receipt of different or upgraded equipment, on the consumer continuing to use the provider as its default provider. *2008 Second TRS Numbering Order*, 24 FCC Rcd at 809-10, para. 38.

<sup>36</sup> 47 CFR § 64.611(a)(3), (4), (j)(1).

<sup>37</sup> *2013 VRS Reform Order*, 28 FCC Rcd at 8647-56, paras. 62-86; 47 CFR §§ 64.611, 64.615.

<sup>38</sup> *See Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities; Structure and Practices of the Video Relay Services Program; Misuse of Internet Protocol (IP) Captioned Telephone Service; et al*, CG Docket Nos. 03-123, 10-51, 13-24, Report and Order, Notice of Proposed Rulemaking, Order, and Declaratory Ruling, 37 FCC Rcd 8107, 8109, para. 5 (2022) (*2022 VRS Improvements Order and NPRM*).

<sup>39</sup> 47 CFR § 64.611(a)(3), (4).

<sup>40</sup> 47 CFR § 64.615(a)(6)(ii), (iii), (iv).

<sup>41</sup> 47 CFR § 64.615(a)(6)(v).

<sup>42</sup> 47 CFR § 64.611(j)(1).

<sup>43</sup> 47 CFR § 64.611(j)(2). *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, Report and Order, Further Notice of Proposed Rulemaking, and Order, 34 FCC Rcd 691, 696-98, paras. 13-15 (2019) (*2019 IP CTS User Database Order*).

<sup>44</sup> *Structure and Practices of the Video Relay Service Program; Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities*, CG Docket Nos. 10-51, 03-123, Report and

(continued....)

2020, the Commission issued a Notice of Proposed Rulemaking proposing to adopt measures and metrics for IP CTS.<sup>45</sup>

### E. Recent Developments

17. Improved communication and information technology has the potential to enhance the capabilities of Internet-based TRS.<sup>46</sup> For text-based relay services, improved ASR systems offer a formidable alternative to the use of human CAs.<sup>47</sup> ASR-generated captions frequently approach or surpass the accuracy of human captioning while increasing speed and reducing cost.<sup>48</sup> Beginning in 2020, the Commission has certified several IP CTS providers that rely solely on ASR.<sup>49</sup>

18. More recently, conditional certifications have been granted to IP Relay providers utilizing automatic text-to-speech and ASR technologies, broadening the available options for text-based phone communications.<sup>50</sup> In late 2024, the Commission certified two IP Relay providers to operate fully automatic IP Relay using ASR and text-to-speech technologies.<sup>51</sup> These innovations aim to provide more

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Order, Notice of Inquiry, Further Notice of Proposed Rulemaking, and Order, 32 FCC Rcd 2436 (2017) (*2017 VRS Improvements Order and FNPRM*); 2018 IP CTS Order and Declaratory Ruling, 33 FCC Rcd 5800.

<sup>45</sup> *Misuse of Internet Protocol (IP) Captioned Telephone Service; 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. 13-24, 03-123, 10-51, Report and Order, Order on Reconsideration, and Further Notice of Proposed Rulemaking, 33 FCC Rcd 10866 (2020) (*2020 IP CTS Metrics Further Notice*).

<sup>46</sup> See *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*; CG Docket Nos. 03-123, 08-15, Notice of Proposed Rulemaking, FCC 25-79, paras. 12-16 (2025) (*2025 Analog TRS Modernization NPRM*).

<sup>47</sup> 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*).

<sup>48</sup> 2018 IP CTS Order and Declaratory Ruling, 33 FCC Rcd at 5828-29, paras. 50-51. The Commission's National Testing Lab offers testing of IP CTS applicants and providers to measure caption delay and accuracy. Such testing generally indicates that ASR captions meet or exceed aggregate speed or accuracy test results for IP CTS providers. See, e.g., *Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities*, CG Docket 03-123, Order, 39 FCC Rcd 254, 256-57, paras. 9-10 (CGB 2024) (*NexTalk Conditional Certification*); *Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities*, CG Docket 03-123, Order, 39 FCC Rcd 245, 247-48, paras. 9-10 (CGB 2024) (*Rogervoice Conditional Certification*); *Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities*, CG Docket 03-123, Order, 39 FCC Rcd 92, 95-96, paras. 9-10 (CGB 2024) (*Nagish Conditional Certification*); *Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities*, CG Docket 03-123, Order, 39 FCC Rcd 82, 86-87, paras. 11-12 (CGB 2024) (*Global Caption Conditional Certification*).

<sup>49</sup> 2020 IP CTS Metrics Further Notice, 35 FCC Rcd at 10896, para. 61.

<sup>50</sup> *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).

<sup>51</sup> *InnoCaption IP Relay Certification Order*, 39 FCC Rcd at 13802, para 8; *Nagish IP Relay Certification Order*, 39 FCC Rcd at 13814, paras. 9-10.

diverse communication options, and better address users' varied needs.<sup>52</sup> The automation of IP Relay enables providers to route calls without interposing a call center, alleviating the need to put users' telephone numbers into the TRS Numbering Directory.<sup>53</sup> However, concerns have been raised regarding the performance of fully automated IP Relay in real-life call scenarios.<sup>54</sup> A coalition of accessibility advocacy and research organizations (AARO) has urged the adoption of objective performance metrics for IP Relay offerings that rely on ASR.<sup>55</sup>

19. Real-Time Text (RTT), an IP-based technology, also has potential to improve the performance of text-based relay services. In the *2025 Analog TRS Modernization NPRM*, we seek comment on the potential to replace TTY-based relay service.<sup>56</sup> In addition, recently updated smartphone operating systems allow users to set third-party applications, including IP Relay applications, as the default for handling calls. This functionality permits a user to select a preferred application to direct all outgoing and incoming calls through the chosen app, potentially integrating the IP Relay service more seamlessly into a user's wireless communications service.

20. On the VRS side, recognizing that video conferencing has evolved into an essential, mainstream communication vehicle, the Commission recently amended its TRS rules to expressly authorize the TRS Fund to support the integrated provision of relay services in video conferences, where the CA is included as a participant on the video conferencing platform.<sup>57</sup> The FCC adopted performance objectives requiring interoperable video conferencing service (IVCS) platforms to provide captions that accurately and synchronously display the spoken communications, and mandate user interface control functions enabling users to activate and adjust the display of captions, including size, font, color, and on-screen location.<sup>58</sup>

### III. NOTICE OF PROPOSED RULEMAKING

21. This Notice explores ways to modernize Internet-based relay services, such as IP Relay and VRS, while streamlining Commission requirements. For IP Relay, the Notice seeks comment on the use of ASR for IP Relay speech-to-text conversion and advanced text-to-speech technologies, the compatibility of IP Relay with RTT technology, and metrics for IP Relay quality. In addition, the Notice seeks comment on providing captioning functionality in VRS calls, allowing additional VRS calling by U.S. residents traveling abroad, and adjusting VRS physical call center requirements. Finally, the notice seeks comment on streamlining TRS provider certification and registration processes, updating or eliminating obsolete rules, and closing several outdated dockets.

#### A. IP Relay

22. The Commission must ensure that our TRS rules encourage the use of existing technology and do not discourage the development of improved technology.<sup>59</sup> With the emergence of

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<sup>52</sup> *Id.* at 13801-02, para. 6 (quoting comments filed by AARO).

<sup>53</sup> 47 CFR § 64.613(a)(2).

<sup>54</sup> *InnoCaption IP Relay Certification Order*, 39 FCC Rcd at 13801-02, para. 6 (quoting comments filed by AARO).

<sup>55</sup> *Id.* See *2020 IP CTS Metrics Further Notice*, 35 FCC Rcd at 10898-902, paras. 66-77. A working group has been working to identify caption quality measures and metrics related to IP CTS. See MITRE, *Telephone Caption Quality Measures and Metrics Working Group Final Report*, <https://www.mitre.org/news-insights/publication/telephone-caption-quality-measures-and-metrics-working-group-final-report> (June 14, 2024). This set of measures and metrics would be applicable to IP CTS's speech-to-text services.

<sup>56</sup> *2025 Analog TRS Modernization NPRM* at 29.

<sup>57</sup> *Access to Video Conferencing et al.*, CG Docket 23-161, Second Report and Order and Further Notice of Proposed Rulemaking, 39 FCC Rcd 11068, 11102-03, para. 97 (2024) (*2024 IVCS Order*).

<sup>58</sup> 47 CFR § 14.21(b)(4).

<sup>59</sup> 47 U.S.C. § 225(d)(2).



ASR technology and text-to-speech functionalities in IP Relay, we seek to leverage this technological progress while understanding and addressing its systemic impact. We invite comment regarding the deployment, performance, potential benefits, or challenges of ASR and automated text-to-speech technologies in the IP Relay context. How can further advancements in text-to-speech technologies enhance the functional equivalency and user experience of IP Relay services?

23. Below, we examine and seek comment on how the availability of ASR and text-to-speech impacts the provision of service and how our rules may need to evolve to address these technological changes, including: establishing appropriate billing requirements for providers that offer both IP Relay and IP CTS on the same platform to prevent accidental or fraudulent overcompensation; reviewing numbering obligations, particularly those concerning the provisioning of routing information for IP Relay users in the TRS Numbering Directory; addressing compatibility with RTT technology to facilitate a smoother transition away from outdated analog systems; and developing quantifiable metrics for speech-to-text and text-to-speech performance to ensure these automated systems consistently meet required minimum standards for quality and functional equivalence.

### **1. Appropriate Billing when Both IP Relay and IP CTS are Offered on the Same Platform**

24. The Commission is committed to ensuring sound financial stewardship of the TRS Fund. While many consumers register for only one form of TRS, individuals with both hearing and speech disabilities may register for both IP Relay and IP CTS.<sup>60</sup> Furthermore, modern applications allow a single platform or device to provide multiple forms of TRS within the application, giving users the flexibility to choose the specific communication mode—such as typing text or speaking—that best suits their needs for a particular call. Users of these platforms now have the ability to switch between IP CTS and IP Relay during the call.<sup>61</sup>

25. This distinction is critical because of the current differential between IP Relay and IP CTS compensation rates, which may create a risk of waste, fraud, and abuse when these services are delivered on the same platforms. For the current Fund Year, IP Relay providers are compensated at a per-minute rate of \$2.1970.<sup>62</sup> By contrast, CA-assisted IP CTS is compensated at \$1.40 a minute (plus a potential supplement), while ASR-only IP CTS is compensated at \$1.05 per minute.<sup>63</sup> The substantial difference in compensation rates appears to create a financial incentive for providers offering both services to potentially misclassify minutes, or to design their platforms to drive users to IP Relay, to secure the higher rate.

26. Recently certified providers offering fully automatic IP Relay utilize ASR to convert the hearing party's speech to text (for the IP Relay user to read) and text-to-speech engines to convey the user's typed message to the hearing party. This fully automated functionality shares significant technical characteristics with ASR-only IP CTS, which consists solely of automated voice-to-text transcription. In

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<sup>60</sup> See, e.g., *Nagish IP Relay Certification Order*, 39 FCC Rcd at 13820, para. 25 (“We stress that billing of an individual’s calls also needs to be consistent with an individual’s registration as a user of IP CTS, IP Relay, *or both*.” (emphasis added)).

<sup>61</sup> See Internet-based TRS Certification Application of Nagish, Inc., CG Docket No. 03-123, at 2-3 (filed June 23, 2022), <https://www.fcc.gov/ecfs/document/106231030902855/1> (“Nagish has combined its IP CTS and IP Relay offerings into a single Internet-based TRS ... solution, allowing users to switch seamlessly between IP CTS and IP Relay on the fly, including during a call.”).

<sup>62</sup> *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, para. 1 (2025). We may address in a future proceeding the issue of whether to compensate CA-assisted IP Relay service at a different rate than ASR-only IP Relay to take account of any differences in costs between CA-assisted and ASR-only IP Relay service.

<sup>63</sup> *Id.*

granting certification for these services, the Consumer and Governmental Affairs Bureau (CGB) cautioned that providers utilizing shared platforms must take care not to bill the TRS Fund at the higher IP Relay rate for minutes that involve only transcription of a caller's speech, without the necessary conversion of the user's communication from text to speech.<sup>64</sup>

27. How should the Commission address the issues arising from the differences in compensation between fully automated IP Relay and ASR-based IP CTS? Should we resolve the difference through changes to the compensation plan for IP Relay or consider technology-based solutions or solutions based on user registration or call reporting requirements? For example, should the Commission establish a rule stating that a call is compensable only at the ASR-only IP CTS rate unless verifiable records demonstrate that the user actively utilized the text-to-speech output necessary for the full IP Relay conversion process? Are there technical mechanisms (e.g., software checks, specialized signaling, real-time logging of active speech or text-to-speech modules) that integrated service platforms could implement to reliably and automatically distinguish minutes provided as IP Relay versus IP CTS in call detail records? Should providers offering both IP Relay and IP CTS on an integrated platform be allowed to include a feature giving users the affirmative choice of selecting the desired service mode at the outset of the call, or the ability to seamlessly switch between modes during the call, to ensure the recorded service type reflects user preference and necessity? Does allowing for such switching impede the ability of providers to automatically collect call detail records? Could such switching increase the likelihood for providers to improperly categorize minutes of use, thus increasing administrative costs for the TRS Fund when corrective action is taken? Are there changes to the process for recording and submitting requests for compensation that could help mitigate such risks? Which registration and verification requirements should users seeking access to both IP Relay and IP CTS follow? How should we ensure the Commission or the Fund administrator will be able to fully review and audit the call detail records and requests for compensation to ensure the reported minutes align with the service provided?

28. We seek comment on whether we should take steps to ensure that CA-assisted IP Relay does not disappear entirely.<sup>65</sup> Does the availability of a human CA provide essential assistance for specific customer segments? Conversely, have ASR and text-to-speech technologies advanced sufficiently to provide comparable service quality even in specialized or challenging contexts? We seek comment on whether a rule requiring a human-assistance option to be included in every IP Relay offering would help maintain IP Relay service quality,<sup>66</sup> or if the current IP Relay environment, which allows consumers to choose between fully automated and CA-assisted forms of IP Relay (which may be offered by the same or different providers), sufficiently protects service quality.

## **2. IP Relay Numbering Obligations**

29. Another issue that arises when IP CTS and IP Relay are provided on the same underlying platform concerns the need for users to designate a default provider for IP Relay and to use the TRS numbering directory to route IP Relay calls. Historically, the infrastructure of IP Relay has involved a live CA converting communications in both directions between the user's text-based Internet connection and the voice caller via the PSTN, thereby creating a necessary two-legged call structure.<sup>67</sup> To improve access to emergency service, allow direct dialing of IP Relay calls, and provide a uniform method for

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<sup>64</sup> See *InnoCaption IP Relay Certification Order*, 39 FCC Rcd at 13810, para. 28; *Nagish IP Relay Certification Order*, 39 FCC Rcd at 13822, para. 31.

<sup>65</sup> Currently, T-Mobile offers CA-assisted IP Relay service, while InnoCaption and Nagish offer automated IP Relay services.

<sup>66</sup> Analogously, in May 2024, the Accessibility Organizations filed a petition for rulemaking requesting that the Commission reverse its decision to allow IP CTS providers to rely exclusively on ASR and instead require an option for users to switch to CA-generated captions at any point during a call. See *Request for Comment on Petition for Rulemaking to Require a Communications Assistant Option for IP CTS*, CG Docket Nos. 13-24, 03-123, RM-11987, Public Notice, 39 FCC Rcd 8533, 8533, para. 1 (CGB 2024).

<sup>67</sup> *2002 IP Relay Declaratory Ruling*, 17 FCC Rcd at 7780-81, paras. 3-4.

calling IP Relay users, the Commission adopted rules providing that an IP Relay user's designated "default" provider shall assign (or port) a geographically appropriate ten-digit NANP number to a IP Relay user and facilitate call routing by entering routing information in the TRS Numbering Directory.<sup>68</sup>

30. Fully automated IP Relay service, which uses automated technology for both speech-to-text and text-to-speech conversions, eliminates the need to connect to a human CA intermediary at a call center and allows IP Relay users to make calls directly to the recipient using an app-based VoIP connection.<sup>69</sup> Therefore, providers of fully automated service may no longer need to put an IP Relay user's telephone number in the TRS Numbering Directory.<sup>70</sup> Further, in relying on existing number assignment processes for VoIP providers, these IP Relay providers would be subject to the Commission's porting and numbering rules applicable to VoIP providers and would no longer need to be identified as default providers, subject to TRS numbering and porting requirements.

31. We seek comment on the continuing need to require all IP Relay providers to add a designated NANP telephone number and associated Uniform Resource Identifier (URI) for each IP Relay user. Are IP Relay providers utilizing ASR and automated text-to-speech able to achieve full connectivity between IP Relay users and voice communication users without utilizing the TRS Numbering Directory? Are such providers able to ensure IP Relay users can call emergency services, including 911 and 988? Are we able to relieve IP Relay providers of the obligation to provision information in the Numbering Directory, or do some IP Relay providers still require a mechanism that maps telephone numbers to a user name, domain name, or IP address? Should we allow the provision of IP Relay without assigning the user a designated Internet-based TRS phone number, if a user has the ability to place and receive IP Relay calls using the number associated with their telephone service? Are there other impacts to call routing if some, but not all IP Relay numbers are in the TRS numbering directory? Will it change or affect how some IP Relay users reach emergency services? If a provider requires the use of the Directory, would it impede the provision of calls between IP Relay users if some or all IP Relay users' telephone numbers are not in the Directory? Do providers have another mechanism to identify IP Relay calls between different providers, to flag such calls as non-compensable from the TRS Fund?<sup>71</sup> What technical methods could be implemented to prevent IP Relay providers from submitting compensation requests for such direct IP Relay-to-IP Relay calls, ensuring accurate Call Detail Records and compliance with the Commission's TRS rules? Are there other fraud or security concerns that may arise from no longer requiring IP Relay providers to provision information in the Numbering Directory? Are there other policy considerations that would support maintaining a requirement that all telephone numbers associated with IP Relay be entered in the TRS Numbering Directory?

### 3. Compatibility with RTT Technology

32. IP Relay, being a text-based service transmitted over the Internet, shares fundamental characteristics with RTT technology due to its reliance on text and IP networks. In the *2025 Analog*

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<sup>68</sup> 47 CFR § 64.611(a). This requirement to assign a geographically appropriate NANP number applies only to VRS and IP Relay providers.

<sup>69</sup> See *Nagish IP Relay Certification Order*, 39 FCC Rcd at 13814-15, paras. 11-12; *Innocaption IP Relay Certification Order*, 39 FCC Rcd at 13803-04, paras. 11-12; *2025 Analog TRS Modernization Notice*, para. 28.

<sup>70</sup> See Nagish Comments, CG Docket Nos. 23-161, 10-213, and 03-123, at 5, n.12 (rec. Feb. 3, 2025) (discussing the potential integration of IP Relay into interoperable video conferencing services and questioning whether requirements for integration with the TRS numbering director and registering as a default provider may prove redundant when IP Relay is provided in a similar way to IP CTS); see also Nagish Comments, GN Docket No. 25-133, at 2, 5-6 (rec. Apr. 14, 2025) (proposing the Commission delete the TRS default provider requirements).

<sup>71</sup> Calls between just IP Relay users are not compensable. 47 CFR § 64.604(c)(14). 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 Further Notice of Proposed Rulemaking, 34 FCC Rcd 8483, 8487, para. 11 (2019) ("[i]n most cases, people using the same form of TRS can understand each other without additional help from a relay service .... The same applies to calls between two TTY users or between two users of IP Relay").

*Modernization NPRM*, we seek comment on the development of an RTT-based TRS to help facilitate the transition from a TTY-based, analog service to one that can be effectively provided on IP networks. Here, we seek to better understand the compatibility and differences between these two IP- and text-based forms of relay—IP Relay, as currently configured, and an RTT-based relay service.

33. We seek comment on the compatibility and interoperability of RTT and IP Relay in an IP calling environment. What standards do IP Relay providers use to carry text conversations across an IP network? Is the text transmission able to synchronize with voice or video transmission to allow for multimedia conversation? How does the connection to a CA in a call center affect the transmission of the text? How does the use of text-to-speech and ASR technologies effect the transmission of the text.

34. We also seek comment on specific rule changes that would facilitate improved compatibility between IP Relay and RTT, including any technical standards or interoperability requirements that should be adopted or modified. For instance, the Disability Advisory Committee's (DAC's) RTT on Wireline Networks Report outlines that interoperation connections must be IP, engineered to support audio and text simultaneously, and support SIP signaling standards, with media elements adhering to RFC 4103.<sup>72</sup> We ask whether further action is needed to ensure support for these standards and protocol in the provision of IP Relay.<sup>73</sup>

35. What specific modifications or standards are necessary for IP Relay access technology (e.g., equipment or software provided by the IP Relay provider) to natively support RTT protocols and user interface features, such as displaying text character-by-character as it is generated, consistent with RTT standards? Would the features and functions of RTT (full duplex operation and seamless integration of voice and text) translate into improved functional equivalence for IP Relay users? We ask commenters to quantify or describe any expected improvements in pacing, conversation flow, and overall efficiency. Would switching from current IP Relay text-typing methods to character-by-character RTT functionality impact the speed, usability, and accessibility for users relying on assistive technologies such as refreshable braille displays or screen readers? Would RTT integration create opportunities for enhanced interoperability across advanced communication service platforms?

36. What are the estimated capital and operational costs required for IP Relay providers to implement RTT compatibility, including necessary changes to access technology, call handling infrastructure, and training for CAs or ASR and text-to-speech engines? Which costs are one-time start-up costs and which are recurring costs? Will integrating RTT into IP Relay create opportunities for long term cost savings?

37. If the Commission mandates RTT integration into IP Relay, what is an appropriate transition period for providers to implement this change? Should this period be a fixed time (e.g., 18 or 24 months), or should implementation be tied to milestones related to the ongoing transition from analog to IP-based networks across the country? Given that RTT integration is proposed to ensure a seamless transition for legacy TTY users,<sup>74</sup> are there specific measures to inform these users about any new RTT-integrated IP Relay options and to assist them in making the transition?

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<sup>72</sup> Disability Advisory Committee, RTT Deployment in Wireline Networks Report at 4 (2022), <https://www.fcc.gov/file/22908/download> (DAC RTT on Wireline Networks Report). The final term of the DAC ended in December 2024. The Consumer Protection and Accessibility Advisory Committee (CPAAC) continues the work of the DAC making recommendations to the Commission on topics relating to accessibility issues. See FCC, Consumer Protection and Accessibility Advisory Committee, <https://www.fcc.gov/consumer-governmental-affairs/advisory-committees-and-groups/consumer-protection-and-accessibility-advisory-committee> (last visited Dec. 30, 2025).

<sup>73</sup> 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 10 (filed Aug. 12, 2024) (Analog TRS Transition White Paper), <https://www.fcc.gov/ecfs/document/10812315813172/1>.

<sup>74</sup> 2025 *Analog TRS Modernization NPRM*, para. 29.

#### 4. Speech-to-Text and Text-to-Speech Metrics

38. *Measures and metrics.* The Commission seeks comment on developing objective, quantifiable measures and metrics for IP Relay services, particularly those employing ASR and automated text-to-speech technologies. The speech-to-text feature of current fully automatic IP Relay services relies on the same ASR engines as providers' IP CTS offerings,<sup>75</sup> and the Commission is already engaged in developing quantitative standards for IP CTS.<sup>76</sup> Therefore, we seek comment on the extent to which such future metrics for IP CTS could be directly applied or adapted to assess the speech-to-text component of IP Relay done using either ASR or with the assistance of a CA. How should we account for differences in expected use between IP Relay and IP CTS? For example, we believe most IP CTS users rely on both captions and residual hearing for comprehension, while most IP Relay users rely solely on the resulting text. Should the quantitative metric for accuracy required for IP Relay be set at a more stringent standard than an accuracy standard adopted for IP CTS? Does the fact that an IP Relay user types a response, suggest the quantitative standard for caption delay for IP Relay should differ from the standard set for IP CTS? Should such questions be brought to a standards body or designated working group for further development?

39. We also seek comment on whether to consider measures and metrics for the text-to-speech functionality in IP Relay, beyond the current qualitative standard requiring CAs to possess clear and articulate voice communication skills.<sup>77</sup> What process should we pursue to develop measures and metrics for text-to-speech? Should we also consider developing measures for CA-assisted text-to-voice IP Relay? What quantitative measures could effectively assess text-to-speech accuracy, clarity, and naturalness? How should the concept of automated text-to-speech "clarity" be quantified—for example, by measuring synthetic voice recognition rates by external testing panels, or by adopting metrics derived from industry standards for audio quality, independent of the ASR transcription process? Should the Commission establish a quantitative standard for the latency or delay of the text-to-speech component? What would be the appropriate measures to consider for such conversational latency or delay in IP Relay?

40. *Performance testing and results.* If the Commission develops metrics and measures for the provision of IP Relay, how should the Commission perform service quality tests? Should the Commission require IP Relay providers offering a hybrid service (ASR and text-to speech alongside human CAs) to report automated performance metrics separate from CA-assisted performance metrics? What level of quality is acceptable and what statistical methods are appropriate for assessing provider performance? How, and how often, should the information be collected? To ensure the accuracy and impartiality of data, should the measurement of IP Relay ASR and text-to-speech quality rely predominantly on testing conducted by an independent entity chosen and overseen by the Commission, or should providers also be required to perform and submit self-testing results? Does the extent to which performance data are self-reported or collected through a third party affect how we should analyze or understand the results? Should the collection method affect the level of performance deemed acceptable? What methodology is appropriate for testing ASR performance in call environments particularly relevant to IP Relay users, such as those using assistive technology like refreshable braille displays or screen readers? Are there rule changes we should consider to facilitate such performance testing? How

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<sup>75</sup> *InnoCaption IP Relay Certification Order*, 39 FCC Rcd at 13803, para. 11; *Nagish IP Relay Certification Order*, 39 FCC Rcd at 13815, para. 12.

<sup>76</sup> *2020 IP CTS Metrics Further Notice*, 35 FCC Rcd at 10898-902, paras. 66-77.

<sup>77</sup> 47 CFR § 64.604(a)(1)(ii). *InnoCaption* states that its text-to-speech technology uses "a natural sounding human voice selected by the consumer" and generates speech audio "verbatim." *InnoCaption IP Relay Certification Order*, 39 FCC Rcd at 13806-07, para. 19. *Nagish* states that its text-to-speech technology uses "high-quality voices . . . carefully chosen to ensure that voice callers communicating with IP Relay users who cannot speak are comprehensible to voice callers who do not rely on speech synthesizers on a regular basis, and properly vocalizes punctuation—for example, by adding longer pauses for periods than for commas." *Nagish IP Relay Certification Order*, 39 FCC Rcd at 13818-09, para. 21.

frequently should such testing be performed and submitted? Should the Commission publish the results of such performance testing? Should it develop a dashboard of performance metrics for IP Relay? What information would be most useful to publish on the dashboard to convey IP Relay performance for the public and for users?

41. Should the Commission adopt specific consequences or remediation practices for IP Relay providers whose measured performance falls below the minimum qualitative standards for ASR accuracy or automated text-to-speech quality?<sup>78</sup> For example, should providers that fail to meet these metrics be required to develop and submit for Commission approval a corrective compliance plan detailing steps and timelines for service improvement?<sup>79</sup> If testing reveals performance disparities (e.g., lower accuracy or clarity), should compensation be withheld or reduced until standards are met?<sup>80</sup> Should testing be part of the Commission's certification and re-certification review processes?

## **B. Video Relay Service**

42. VRS enables individuals with hearing or speech disabilities who use ASL to communicate by video with voice telephone users.<sup>81</sup> The service operates through a video link via the Internet, allowing a CA—a qualified sign language interpreter—to view and interpret the party's signed conversation and relay the conversation back and forth with (in most cases) a voice caller.

### **1. ASR Captioning**

43. As reflected in the Commission's recent adoption of captioning requirements for video conference providers, automation has transformed the economics of captioning, making it practicable to offer captioning with most forms of video communication.<sup>82</sup> As video communication technologies continue to advance and become more integrated into daily life, we believe it is timely to consider similar enhancements for VRS to ensure its continued functional equivalence with voice communication services and other video communication platforms.

44. Captioning has become a widespread and commonplace feature across various communication platforms, including general IVCS platforms, where the Commission has moved to adopt performance objectives for the provision of captions that are accurate and synchronous.<sup>83</sup> With the increased availability of captioning to any person (including hearing individuals) using communications services, we seek comment on requiring VRS providers to build in captioning functionality for what the CA voices when transliterating signs to spoken English. This would ensure that the VRS user, in addition to seeing the CA's signed interpretation, would also simultaneously receive a text display of the CA's spoken output. We assume that integrating captioning functionality directly into VRS platforms would be beneficial for ensuring conversation comprehension between ASL users and hearing individuals, by providing the ASL user with a secondary check to their conveyed information, comparable to the ability of hearing individual to hear their own words in a voice communication.<sup>84</sup> VRS users would be able to monitor the quality<sup>85</sup> of the CA's interpretation by allowing them to assess the CA's voiced interpretation

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<sup>78</sup> 2020 *IP CTS Metrics Further Notice*, 35 FCC Rcd at 10905-06, para. 85.

<sup>79</sup> *Id.*

<sup>80</sup> *Id.*

<sup>81</sup> 47 CFR § 64.601(a)(57) (definition of VRS).

<sup>82</sup> 2024 *IVCS Order*, 39 FCC Rcd at 11084-85, para. 38 (requiring IVCS providers to “provide at least one mode with captions that accurately and synchronously display the spoken communications in a video conference”).

<sup>83</sup> *Id.*

<sup>84</sup> 47 U.S.C. § 225(a)(3) (defining TRS to be communication services that enable communication that is functionally equivalent to voice communications services used by hearing individuals).

<sup>85</sup> See, e.g., 2017 *VRS Improvements Order and FNPRM*, 32 FCC Rcd at 2466, para. 68 (citing to consumer organizations which have shown concern about the quality of VRS interpretation).

of their signs—by comparing the simultaneously displayed text of that interpretation with what they originally signed, thereby ensuring the accuracy of their communication, while also enhancing the transparency and accountability of the relay service.<sup>86</sup> We seek comment on these assumptions.

45. In addition to captioning the CA's voiced interpretation, we seek comment on whether to require VRS providers to build in captioning functionality for what the hearing caller is saying. Such options align with communications services currently available to hearing users in the communications services marketplace.<sup>87</sup> This would provide the VRS user with direct text of the hearing party's speech, complementing the CA's signed interpretation. This integration would provide greater flexibility for the user, allowing them to choose how they receive and process information during a VRS call, depending on their individual preferences, communication mode (e.g., residual hearing combined with visual text), or environmental factors. We assume this would offer VRS users a more complete and redundant visual representation of the conversation, potentially enhancing comprehension and further facilitating a multi-modal approach to communication in a manner functionally equivalent to the voice communication available to hearing individuals. We seek comment on this assumption.

46. We also seek comment on whether users should be able to adjust the display of captions on VRS software. In the *Second IVCS Order*, the Commission adopted performance objectives for IVCS providers to provide user interface controls, which permit users to activate and adjust the display of captions.<sup>88</sup> We seek comment on adopting a similar requirement that users be able to activate and adjust the display of captions, allowing them to alter the size, font, and on-screen location of captions, and adjust the color and opacity of both the captions and the caption background. We assume that this measure aligns with the Commission's broader goal of empowering individuals with disabilities through independent user control over accessibility-related settings, which is essential for managing individual preferences and needs across various communication platforms.<sup>89</sup> Additionally, we assume independent user control of the display of captions would enhance access for people who use ASL and have limited vision. By enabling VRS users to optimize caption readability and have effective communication, such controls would appear to advance the statutory mandate for functionally equivalent TRS to be made available in the most efficient manner.<sup>90</sup> We seek comment on these assumptions. Are there potential unintended consequences with allowing simultaneous captioning and signing? For example, given that there are grammatical differences between written English and ASL, could the simultaneous display of ASL and text cause confusion or impede the flow of conversation, if VRS users seek to verify the ongoing accuracy of CA signing? Are there captioning settings or best practices available that could help mitigate any unintended consequences?

47. We seek comment on the costs and benefits of implementing built-in captioning and customizable display settings. Is it technically feasible for VRS providers to implement built-in captioning with customizable display settings? Are there potential cost savings associated with the enhance comprehension that captions may provide? What are the one-time and ongoing costs that VRS providers would incur to develop and maintain built-in captioning and customizable display settings? How should the TRS Fund administrator categorize those costs? Are there alternative ways VRS

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<sup>86</sup> 47 U.S.C. § 225(d)(1)(G) (prohibiting relay operators from intentionally altering conversations); 47 CFR § 64.604(a)(1)(iv) (requiring VRS CAs to be qualified interpreters).

<sup>87</sup> IVCS platforms, as well as certain operating systems for wireless providers, including iOS and Android, include options for users to enable captioning. See *2025 Analog TRS Modernization NPRM*, para. 44 (discussing the inclusion of native ASR functions on smart devices).

<sup>88</sup> *2024 IVCS Order*, 39 FCC Rcd at 11089-90, para. 53. “Adjusting the display of captions means that a video conference participant can alter the size, font, and on-screen location of captions and adjust the color and opacity of both the captions and the caption background.” 47 CFR § 14.21(b)(4)(ii)(A).

<sup>89</sup> See, e.g., 47 CFR § 14.21(b)(1) (in the IVCS context, requiring that input, control, and mechanical functions be locatable, identifiable, and operable in accordance with listed factors).

<sup>90</sup> 47 U.S.C. § 225(a)(3), (b)(1).



providers could make captioning available, such as, through integration of third-party applications? We ask that commenters discuss the costs and benefits of any alternative proposals.

48. We also seek comment on whether any captioning requirements we adopt should be applicable to dedicated VRS devices (i.e., videophones) distributed by providers, as well as the VRS software made available for use with off-the-shelf devices such as smart phones, tablets, computers, and laptops, or via web versions of the VRS platform? Would captioning functionality be most efficiently provided in the VRS context by attaching it to the service, as with most IVCS platforms, or by providing it through a VRS user's equipment, as with the captioning made available through the operating systems of wireless devices, independently of a voice communications service? We seek comment on the scope of our authority under section 225 to require manufacturers of VRS access technology equipment to support captions and customizable display settings.<sup>91</sup> The Commission often distinguishes between its ability to allow TRS Fund support for services and service-related software and web-based applications for off-the-shelf devices and provider build and provisioned consumer premises equipment (CPE).<sup>92</sup> Is the Commission only able to adopt such a requirement where it is able to ensure such costs are compensable through TRS Fund support? To meet the definition of TRS, must a telephone transmission service, such as VRS, or a manufacturer of VRS access equipment conform to the requirement that equipment used for advanced communications service or telecommunications services is accessible to and usable by individuals with disabilities, even if the equipment costs are not compensable through the TRS Fund?<sup>93</sup>

## 2. International Dialing while Traveling Abroad

49. U.S. residents who are VRS users frequently need to make telephone calls while traveling abroad. Our current rules allow TRS Fund support (after notice to the user's default VRS provider) when such users place calls to the United States,<sup>94</sup> but they do not address compensation for calls placed to other endpoints. Recently, the United States Department of State (State Department) asked the Commission to permit TRS Fund support when VRS users traveling abroad make calls to U.S. embassies and consulates, which have telephone numbers local to the country where they are located.<sup>95</sup> In its request, the State Department explains that its "dedicated consular teams around the world stand ready to assist, and our embassies and consulates maintain duty rosters to coordinate help on a 24/7 basis, for U.S. residents who need assistance due to a medical emergency, lost passport, death, arrest, or other unanticipated event."<sup>96</sup>

50. To facilitate the safety and security of VRS users traveling abroad, we propose to require VRS providers to complete VRS calls to a designated list of international numbers for U.S. embassies and consulates. We seek comment on the technical feasibility, estimated costs, and potential benefits of mandating VRS providers to facilitate these types of calls to a pre-approved list of diplomatic facilities. How would such a requirement impact VRS provider operations, the TRS Fund, and the functional

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<sup>91</sup> 47 U.S.C. § 225(a)(3), (b)(1).

<sup>92</sup> 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, Report and Order, Further Notice of Proposed Rulemaking, 38 FCC Rcd 9157, 9172-73, 9177-78, paras. 32, 34, 45-46 (2023) (*2023 VRS Compensation Order*).

<sup>93</sup> 47 U.S.C. §§ 255, 617.

<sup>94</sup> 47 CFR § 64.604(d)(6).

<sup>95</sup> *Comment Sought on Request by U.S. Department of State to Allow International VRS Calls to U.S. Embassies and Consulates*, CG Docket Nos. 03-123, 10-51, Public Notice, 39 FCC Rcd 12454 (2024).

<sup>96</sup> See Letter from Rena Bitter, Assistant Secretary, U.S. Department of State, to Jessica Rosenworcel, Chairwoman, FCC (filed Sept. 23, 2024), <https://www.fcc.gov/ecfs/document/10923573719951/1> (State Department Petition).



equivalence of VRS for users seeking to connect with U.S. government services while abroad? What safeguards are necessary to ensure appropriate use and prevent misuse of this service?

51. We also note that, in comments on the State Department proposal, some commenters also contended that to allow calling between two foreign points *only* if such calls terminate in international numbers for U.S. embassies and consulates would be “difficult to implement.”<sup>97</sup> What technical modifications would be necessary to be able to facilitate connections between VRS users and U.S. government services using non-NANP numbers?

52. In prior comments on the State Department’s request, several parties urged the Commission to allow VRS providers to be compensated for calls between any foreign end points.<sup>98</sup> We decline, however, to broaden the scope of our international calling rules beyond the specific requirement proposed today regarding calls placed to U.S. embassies and consulates. Nor do we seek to revisit the Commission’s prior determination that, in general, calls that originate and terminate outside of the United States are non-compensable.<sup>99</sup> We limit our proposal to an exception for calls to U.S. embassies and consulates that we believe are permissible under section 225.

53. *Legal Authority.* We also seek comment on our legal authority to allow TRS Fund support for U.S. residents’ use of TRS for calls to U.S. embassies and consulates. CGB previously determined that VRS calls that both originate and terminate outside the United States are not compensable.<sup>100</sup> This determination was based on the text of section 225, which directs the Commission to ensure that TRS are available to “hearing-impaired and speech-impaired individuals in the United States.”<sup>101</sup> However, in so directing the Commission, section 225 expressly references section 1 of the Act, which establishes the Commission, “for the purpose of regulating interstate and *foreign* commerce in communication by wire and radio,” so as to make communication service available “to all the people of the United States.”<sup>102</sup> To interpret section 225 in harmony with section 1, we believe that section 225 should not be construed as limiting the Commission’s authority to make VRS available to “the people of the United States” (i.e., to U.S. citizens and legal U.S. residents) when such individuals are temporarily located outside the United States.

54. Further, the Commission has previously interpreted section 225 as allowing U.S. residents to make calls to the United States while temporarily located abroad for periods of up to one year.<sup>103</sup> We believe that supporting VRS calls to U.S. embassies and consulates by U.S. residents traveling abroad, even where the dialed number is a foreign end point, is similarly permissible under section 225, notwithstanding CGB’s prior determination regarding international calling in general. U.S. embassies and consulates are the primary way for a U.S. citizen traveling abroad to contact the United

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<sup>97</sup> Convo Reply Comments at 3 (rec. Dec. 16, 2024); Sorenson Comments at 2 (rec. Dec. 10, 2024).

<sup>98</sup> Convo Reply Comments at 3 (rec. Dec. 16, 2024); Sorenson Comments at 1 (rec. Dec. 10, 2024); Deaf Equality et. al Comments at 2 (rec. Dec. 6, 2024).

<sup>99</sup> See *Structure and Practices of the Video Relay Service Program*, CG Docket No. 10-51, Declaratory Ruling, Order and Notice of Proposed Rulemaking, 25 FCC Rcd 6012, 6024, para. 27 (2010) (*2010 VRS Notice of Proposed Rulemaking*) (“VRS calls that both originate *and* terminate outside the United States are not compensable”).

<sup>100</sup> See *Structure and Practices of the Video Relay Service Program*, CG Docket No. 10-51, Declaratory Ruling, 25 FCC Rcd 1868, 1872, para. 9 (CGB 2010) (*2010 VRS Declaratory Ruling*) (VRS calls that both originate and terminate outside of the United States are not compensable from the Fund under section 225); *2010 VRS Notice of Proposed Rulemaking*, 25 FCC Rcd at 6024, para. 27 (citing the *2010 VRS Declaratory Ruling*).

<sup>101</sup> 47 U.S.C. § 225(b)(1).

<sup>102</sup> 47 U.S.C. § 151 (emphasis added).

<sup>103</sup> *2022 VRS Improvements Order and NPRM*, 37 FCC Rcd at 8134, para. 69.

States government for support and assistance.<sup>104</sup> While the U.S. government has chosen to utilize calling numbers assigned to the country where the U.S. embassy or consulate is located, that does not change the intent of the VRS caller to reach the United States government. We note that, as a strictly legal matter, U.S. embassies and consulates may not constitute the territory of the United States. However, international law regards the premises of a foreign mission as “inviolable,” such that “the agents of the receiving State may not enter them, except with the consent of the head of the mission.”<sup>105</sup> In addition, “[t]he receiving State is under a special duty to take all appropriate steps to protect the premises of the mission against any intrusion or damage and to prevent any disturbance of the peace of the mission or impairment of its dignity,” and “[t]he premises of the mission, their furnishings and other property thereon and the means of transport of the mission shall be immune from search, requisition, attachment or execution.”<sup>106</sup> Conversely, embassy and consular staff are subject to the laws of their home country.<sup>107</sup> Thus, it appears that for many legal purposes, a U.S. embassy or consulate is treated *as if* it were part of the United States. For these reasons, we believe it is permissible to designate such calls as compensable and to require VRS providers to ensure that VRS users may complete such calls. We seek comment on these beliefs.

55. In what specific respects are embassies or consulates treated (or not treated) as if they were part of the United States? In construing section 225 in this context, how should we resolve the seeming incongruity between the Commission’s authority under section 225 “to carry out the purposes established under section 151 of this title, to make available to individuals *in* the United States a rapid, efficient nationwide communication service” by ensuring the availability of TRS,<sup>108</sup> and the purpose actually stated under section 151, i.e., “regulating interstate and *foreign* commerce in communication by wire and radio so as to make available, so far as possible to all people *of* the United States...a rapid, efficient, Nation-wide, and world-wide wire and radio communication service...”<sup>109</sup> To the extent that we find the phrase “in the United States” in section 225(b)(1) refers to the physical territory of the United States, does that preclude the Commission from ensuring that communications capabilities made available to U.S. residents are also available to such individuals when they leave the United States? Do the provisions of section 225 requiring common carriers to ensure the availability of TRS throughout the area in which it offers services<sup>110</sup> and requiring the Commission to ensure the regulations do not discourage or impair the development of improved technology,<sup>111</sup> permit international TRS, when technologically feasible and where TRS Fund contributors offer such world-wide voice communication services? If the people of the United States can use voice communications services to engage in communications world-

<sup>104</sup> See U.S. Department of State, *Help Abroad*, <https://travel.state.gov/en/international-travel/help-abroad.html> (last visited Dec. 29, 2025); State Department Petition at 1 (“dedicated consular teams around the world stand ready to assist U.S. citizens 24/7 in a medical emergency, when they are victims of crime, when crisis strikes, or when faced with other unanticipated events”).

<sup>105</sup> Vienna Convention on Diplomatic Relations (1961), art. 22, § 1 (Vienna Convention), [https://legal.un.org/ilc/texts/instruments/english/conventions/9\\_1\\_1961.pdf](https://legal.un.org/ilc/texts/instruments/english/conventions/9_1_1961.pdf).

<sup>106</sup> Vienna Convention, art. 22, §§ 2-3.

<sup>107</sup> See, e.g., 18 U.S.C. § 7 (With respect to criminal offenses committed by or against a national of the United States, including the premises of United States diplomatic, consular, military or other United States Government missions or entities in foreign States, within the scope of its jurisdiction); Vienna Convention, art. 31, § 4 (Immunity from the jurisdiction of the receiving State does not exempt diplomatic agent from the jurisdiction of the sending state); *U.S. v. Corey*, 232 F.3d 1166, 1180 (Ninth Cir. 2000) (Independent nations ceded their exclusive control over their territory through treaties, and the terms of those agreements govern concurrent jurisdiction).

<sup>108</sup> 47 U.S.C. § 225(b)(1).

<sup>109</sup> 47 U.S.C. § 151 (emphasis added).

<sup>110</sup> 47 U.S.C. § 225(c).

<sup>111</sup> 47 U.S.C. § 225(d)(2).

wide regardless of their location, does functional equivalence necessitate telephone transmission services being available on the same worldwide scale to meet the definition of TRS?

### 3. Cap On VRS At-Home Minutes

56. In the *2023 VRS Improvements Order*, the Commission increased the cap on VRS call minutes that could be handled by CAs working from home workstations from 50% to 80% of a provider's monthly minutes.<sup>112</sup> This action implicitly established a 20% minimum requirement for monthly VRS minutes to be handled within physical call centers.<sup>113</sup>

57. The decision to maintain the minimum 20% physical call center requirement was deemed necessary to ensure that newly hired or inexperienced CAs can benefit from in-person supervision or mentoring by experienced CAs and to help ensure continuity of service.<sup>114</sup> Although VRS providers were permitted to operate entirely remotely during the COVID-19 pandemic, pursuant to waivers, even during that period no provider relied exclusively on at-home CAs. Given that the arguments for complete removal of the cap had not been empirically tested, the Commission decided to maintain a minimum level of call center staffing.<sup>115</sup>

58. In its November 13, 2025, *ex parte*, Sorenson notes that VRS is the only form of TRS subject to a physical call center mandate and advocates for more flexibility as to the minimum 20% physical call center requirement.<sup>116</sup> In consideration of its arguments, we seek comment on whether, based on provider and consumer experience since the 80% cap became effective, the rationale supporting the 20% minimum physical call center minute requirement remains valid and whether the 80% cap should be removed.

59. Does the experience of VRS providers operating under the 20% mandatory minimum for minutes handled through physical call centers show that these call centers are still essential for safeguarding the quality, reliability, and continuity of VRS? Are the monitoring and oversight rules regarding supervision, technical requirements, and random inspections<sup>117</sup> adequate to provide comparable supervision and training remotely, thereby obviating the need for a fixed 20% minimum call center minute requirement? Given that no other form of TRS is subject to a mandatory physical call center threshold, does this requirement for VRS create unnecessary cost burdens or inefficiencies that hinder VRS providers' ability to utilize their labor force in the most cost-effective manner? If eliminated, what benefits (e.g., reduced overhead expenses or improved CA retention) could be realized and how should the Commission quantify these savings and benefits?

60. What is the impact of the current 20% minimum physical presence requirement on VRS providers' ability to recruit and retain qualified CAs? Are there any quantitative data on call quality, speed-of-answer compliance, and consumer complaint rates for minutes handled in physical call centers versus at-home workstations since the 80% cap took effect, including any metrics related to CA productivity or turnover? How has the 20% minimum physical presence requirement impacted the service experience of VRS users? Is there any empirical evidence demonstrating a quantifiable degradation of service quality directly attributable to increased reliance on at-home CAs? Conversely, absent such evidence, should the minimum physical presence requirement be removed entirely? If the Commission were to remove the 20% minimum minute requirement, should it mandate that VRS

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<sup>112</sup> *2023 VRS Improvements Order*, 38 FCC Red at 12755, para. 11.

<sup>113</sup> *Id.* at 12757, para. 15.

<sup>114</sup> *Id.*

<sup>115</sup> *Id.* at 12757, para. 15 and n.64.

<sup>116</sup> Letter from Howard Waltzman, Counsel to Sorenson Communications, LLC, to Marlene H. Dortch, Secretary, FCC, CG Docket Nos. 03-123, 08-15, at 2 (filed Nov. 13, 2025) (*Sorenson Ex Parte*).

<sup>117</sup> 47 CFR § 64.604(d)(7).

providers continue to maintain a minimum number of physical call centers (not related to minute volume) to ensure infrastructure redundancy and sufficient resources for staff supervision and technical support?

61. Should the Commission remove the 20% minimum requirement for monthly VRS minutes to be handled within physical call centers, then it may be possible that a VRS provider will no longer have any call centers. In light of that possibility, we seek comment on making conforming changes to several requirements for VRS providers to provide services at home workstations “equivalent to” or “to the same extent as” those provided at call centers.<sup>118</sup> We seek comment on how removing the 20% minimum call center requirement would affect the current requirements for VRS providers to “provide at-home CAs equivalent support to that provided to CAs working from call centers,”<sup>119</sup> “ensure that each home workstation enables the provision of confidential and uninterrupted service to the same extent as the provider’s call centers,”<sup>120</sup> and “ensure that off-site supervision approximates the level of supervision at the provider’s call center.”<sup>121</sup> Would it be sufficient to require VRS providers to provide support and supervision to CAs and require all home workstations to enable the provision of “confidential and uninterrupted service” even without a physical call center to serve as a point of comparison for these standards?<sup>122</sup>

### C. TRS User Registration and Verification Requirements

62. *Streamlining existing user registration and verification requirements.* We seek comment on unifying and streamlining the existing user registration and verification requirements, particularly those currently organized within section 64.611 of our rules, which are presently grouped by VRS, IP CTS, and IP Relay. The objective of this streamlining is to create a more coherent and consistent regulatory framework, while retaining specific provisions where necessary to address inherent differences between particular forms of TRS, such as technological capabilities or service delivery models.

63. Currently, section 64.611 delineates distinct registration requirements for each Internet-based form of TRS. For instance, section 64.611(a)(4) specifies the information to be collected and transmitted to the User Database for VRS users.<sup>123</sup> Similarly, IP CTS providers are required to collect and transmit user information to the User Database under section 64.611(j)(2).<sup>124</sup> As the Commission moves towards extending user registration and verification requirements to all forms of TRS, including analog services and future IP-based services,<sup>125</sup> the need for a unified and streamlined regulatory framework becomes even more apparent. We believe such an approach would enhance clarity, reduce complexity for providers, and ensure consistent application of anti-fraud measures across the entire TRS program. Are there considerations that cut against this belief? We seek comment on how to best achieve this unification and streamlining within section 64.611. Are there specific rule consolidations we should consider? Are any distinctions between user registration and verification requirements for specific forms of Internet-based TRS necessary? What impact, if any, would there be on compliance and administration

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<sup>118</sup> 47 CFR § 64.604(d)(7)(ii)(B) (provide at-home CA support equivalent to that provided to CAs working from call centers), (d)(7)(iii) (confidential and uninterrupted service at home workstations to be provided at the same extent as call centers), (d)(7)(iv)(C) (off-site supervision to approximate the level of supervision at a call center), (d)(7)(v) (home workstations and their records shall be subject to review, inspection, or audit by the Commission to the same extent as call centers and call center records).

<sup>119</sup> 47 CFR § 64.604(d)(7)(ii)(B).

<sup>120</sup> 47 CFR § 64.604(d)(7)(iii).

<sup>121</sup> 47 CFR § 64.604(d)(7)(iv)(C).

<sup>122</sup> 47 CFR § 64.604(a)(2) (confidentiality), 64.604(b)(4)(ii) (uninterrupted power for emergency use).

<sup>123</sup> 47 CFR § 64.611(a)(4).

<sup>124</sup> 47 CFR § 64.611(j)(2).

<sup>125</sup> 2025 *Analog TRS Modernization NPRM*, paras. 79-81.

as a result of this consolidation and streamlining of existing user registration and verification requirements?

64. *Optimal allocation of user registration and verification responsibilities.* Building on these considerations, we seek comment on the optimal allocation of responsibilities within the user registration process. Under our rules, VRS and IP CTS providers collect user information and transmit it to the User Database administrator, who then conducts the identity verification check.<sup>126</sup> Is this division of labor the most efficient and effective model, or are changes warranted? Should the User Database Administrator remain the primary entity for identity verification, or is there a more efficient option? For example, we seek comment on the feasibility and desirability of the administrator establishing a direct user registration portal. This alternative model would allow users to submit their registration information directly to the User Database, rather than through their chosen provider, potentially streamlining the initial collection process and enhancing neutrality. In addition, this approach would eliminate the need for users to register and obtain identity verification each time they change to a different TRS provider. What are the operational implications, costs, benefits, and any associated privacy concerns for each of these models, including how they might impact user experience, program integrity, and the overall efficiency of the TRS program? How would this improve the user experience compared to how user registration is currently done?

#### **D. TRS Certification Applications**

65. We seek comment on how the overall provider certification process could be streamlined to reduce the amount of detail the applicant must provide to demonstrate it will meet all applicable TRS mandatory minimum standards. To what extent are detailed descriptions essential for determining whether to certify a provider? How can an applicant provide a detailed description of how the applicant will meet all applicable TRS mandatory minimum standards in a way that demonstrates the applicant's eventual ability to actually comply with these standards? To what extent are detailed descriptions essential for determining whether to certify a provider? Is there information we collect unnecessarily, or require providers to retain beyond its useful period? For example, should we limit the required listing of employees to those who are CAs, executives, or officers?<sup>127</sup> Should we reduce the retention period for employment agreements for employees other than CAs, executives, or officers?<sup>128</sup> Should we eliminate the requirement to include in certification applications detailed descriptions and copies of certain deeds or leases (e.g., for facilities, their technology and equipment, and automatic call distribution) for call centers located within the United States, while requiring these descriptions and copies for call centers located outside the United States?<sup>129</sup>

66. What are the potential benefits, drawbacks, and feasibility of streamlining the certification process in this manner, particularly concerning its impact on administrative efficiency, regulatory oversight, and the continued assurance of functional equivalence for TRS users while preventing waste, fraud, or abuse of the TRS Fund? Is there any aspect of the certification process, including other relevant rules, that the Commission should consider as it works to streamline the certification process for Internet-based TRS providers? Are there other certification processes that we should evaluate as useful models?

67. Additionally, we seek comment on how the recertification process could be streamlined to reduce the amount of detail the applicant must provide to demonstrate it continues to meet all

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<sup>126</sup> 47 CFR § 64.611(a)(4), (j)(2). While the rule structure is in place, IP CTS providers do not currently submit user data to the User Database administrator.

<sup>127</sup> 47 CFR § 64.606(a)(2)(ii)(C).

<sup>128</sup> 47 CFR § 64.606(a)(2)(ii)(D).

<sup>129</sup> 47 CFR § 64.606(a)(2)(ii)(A). See ZP Better Together, LLC, Comments, GN Docket No. 25-133, at 8-9 (rec. Apr. 11, 2025), <https://www.fcc.gov/ecfs/document/10411597621479/1> (recommending that the Commission significantly streamline the requirements for certification applications).

applicable TRS mandatory minimum standards. How can we leverage information collected with the initial application and during the certification period, while maintaining a robust recertification process? Would requiring details only when a change has been made since the initial application meet the goal of ensuring the Commission has complete and accurate information to consider applications for recertification? Should we allow Internet-based TRS providers to refer to information previously filed with the Commission in lieu of including detailed descriptions of how they will meet the mandatory minimum standards applicable to each form of TRS in their recertification applications?<sup>130</sup> If we retain requirements to include detailed descriptions and copies of certain deeds or leases (e.g., for call center facilities, their technology and equipment, and automatic call distribution) in initial certification application, should we eliminate the requirement for recertification applications?<sup>131</sup> Should the Commission eliminate the requirement to file copies of sponsorship arrangements?<sup>132</sup>

68. We also seek comment on several additional targeted revisions to the TRS provider certification rule in an effort to enhance administrative efficiency, remove redundant obligations, and ensure the accuracy of our regulatory text. We propose correcting a cross-reference to ensure that the required certification documentation, which describes measures taken by IP CTS providers to prevent seeking compensation for ineligible users, accurately points to the proper IP CTS registration and certification rules codified under section 64.611(j).<sup>133</sup> To provide greater administrative flexibility, we propose deleting unnecessary constraints regarding the format used by the Commission to issue certification,<sup>134</sup> recognizing that while these rules may have previously specified a letter or order, the Commission currently uses various administrative documents to grant conditional certification, provided the provider is determined to meet all applicable mandatory minimum TRS standards and compliance requirements.

69. Finally, to reduce paperwork burden now that the relevant programs have matured, we propose to eliminate the requirement for Internet-based TRS providers to submit an annual compliance report demonstrating that they are in compliance with section 64.604 of the Commission's rules.<sup>135</sup> We also propose to eliminate a parallel requirement that applicants promise to file an annual compliance report.<sup>136</sup> Through this proposal, we would also eliminate the additional obligation on VRS providers to submit a compliance plan describing the provider's policies, procedures, and practices for complying with section 64.604(c)(13)<sup>137</sup> and submit specific statistics related to at-home call handling.<sup>138</sup> We believe that annual compliance reports impose an unnecessary administrative burden on TRS providers.

70. While we believe that comprehensive annual reporting on compliance creates unnecessary and burdensome paperwork, we also maintain a strong commitment to the prevention of waste, fraud, and abuse in the TRS program. We believe all TRS providers must have in place, and train their staff to carry out, clearcut, detailed procedures for compliance with applicable Commission rules. Therefore, instead of the annual compliance reporting currently required, we propose to require that, upon request by the Commission, a TRS provider must submit a detailed description of its current practice and future plans for complying with each rule specified in such request. We propose that a provider should be able to complete and submit such a compliance report and plan within 60 days of receiving a request from

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<sup>130</sup> 47 CFR § 64.606(a)(2)(ii).

<sup>131</sup> 47 CFR § 64.606(a)(2)(ii)(A).

<sup>132</sup> 47 CFR § 64.606(a)(2)(ii)(E).

<sup>133</sup> 47 CFR § 64.606(a)(2)(ii)(F).

<sup>134</sup> 47 CFR § 64.606(b)(1), (2).

<sup>135</sup> 47 CFR § 64.606(g).

<sup>136</sup> 47 CFR § 64.606(a)(2)(iv).

<sup>137</sup> 47 CFR § 64.606(g)(3)-(4).

<sup>138</sup> 47 CFR § 64.606(g)(5).

the Commission. The new requirement and timeframe are similar to our current rule, under which the Commission may notify a VRS provider if we determine its compliance plan currently on file is inadequate to prevent waste, fraud, and abuse of the TRS Fund and giving the provider up to 60 days to submit an amended compliance plan.<sup>139</sup> The current requirement is limited to VRS providers, while the proposed rule would apply to providers of all forms of TRS. We seek comment on these proposals and beliefs.

#### **E. Notification of Substantive Changes**

71. Section 64.606(f)(2) of the Commission's rules requires VRS and IP Relay providers to notify the Commission of substantive changes in their TRS programs, services, and features within 60 days of when such changes occur.<sup>140</sup> Providers must also certify that the interstate TRS program continues to meet federal minimum standards after implementing the substantive change.<sup>141</sup> While section 64.606(f)(2) mentions only VRS and IP Relay providers, the Commission has required some IP CTS providers (as a condition of certification) to promptly report any changes in the information provided to the Commission during their application and supplemental filings, including changes in service agreements, suppliers, or the manner in which they provide service.<sup>142</sup>

72. In recognition of this inconsistent policy and to ensure clarity and uniformity across all Internet-based relay services, we propose to amend section 64.606(f)(2) to replace the specific references to "VRS and IP Relay providers" with the broader term "Internet-based TRS providers."<sup>143</sup> This proposed modification would ensure that a uniform notification requirement is applicable to each Internet-based TRS provider. Furthermore, this amendment would accommodate the emergence of new Internet-based relay services, such as the recently proposed Internet Protocol Speech-to-Speech Relay Service (IP STS),<sup>144</sup> avoiding the need for further rule modifications for each new service. This approach promotes efficiency and minimizes administrative burdens for both providers and the Commission by establishing a clear, overarching requirement for all Internet-based TRS offerings. We seek comment on this proposal.

73. We also propose to adjust the text of the rule to eliminate any possible doubt regarding the timing of the required notification.<sup>145</sup> The rule currently requires that "[s]tates must notify the Commission of substantive changes in their TRS programs within 60 days of when they occur" and providers "must notify the Commission of substantive changes in their TRS programs, services, and features within 60 days of when such changes occur." We propose to replace "of when" with "after" to emphasize that this notification does not have to be given in advance of a substantive change. We seek comment on this proposal.

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<sup>139</sup> 47 CFR § 64.606(g)(4).

<sup>140</sup> 47 CFR § 64.606(f)(2).

<sup>141</sup> 47 CFR § 64.606(f)(2).

<sup>142</sup> See, e.g., *NexTalk Conditional Certification*, 39 FCC Rcd at 259-60, para. 16 (certifying NexTalk as an IP CTS provider and requiring NexTalk "to report promptly any changes in the information previously provided to the Commission in its application and supplemental filings, including, for example, any changes in service agreements and suppliers, procedures for registering and screening prospective users, or the manner in which NexTalk provides service"); *Rogervoice Conditional Certification*, 39 FCC Rcd at 250-51, para. 16 (same, for Rogervoice); *Nagish Conditional Certification*, 39 FCC Rcd at 98, para. 16 (same, for Nagish).

<sup>143</sup> 47 CFR § 64.606(f)(2).

<sup>144</sup> See *2025 Analog TRS Modernization Notice*, para. 51 (proposing to authorize IP STS as a compensable form of TRS).

<sup>145</sup> 47 CFR § 64.606(f)(1) (states), (2) (providers).

**F. Incentives for Use of TRS**

74. The Commission's rules currently prohibit IP CTS and VRS providers from offering direct or indirect incentives, financial or otherwise, to encourage registration for or use of these services.<sup>146</sup> These prohibitions were established to prevent waste, fraud, and abuse in the TRS program, in which, due to the per-minute compensation system, providers may be motivated to encourage unnecessary use of relay services solely for the purpose of generating additional revenue.<sup>147</sup> Such practices result in increased costs that are borne by all providers and users of communication services, impeding the statutory goal of making functionally equivalent services available in the most efficient manner.<sup>148</sup>

75. To protect the long-term sustainability and integrity of the TRS Fund as new technologies arise, we propose to amend section 64.604(c)(8) so that the prohibition on incentives and inducements applies broadly to all Internet-based TRS, including IP Relay and prospective services such as IP STS, Video-Assisted STS, and RTT-based relay service.<sup>149</sup> This expansion is intended to strengthen the integrity and safeguard the TRS Fund from waste, fraud, and abuse program-wide. We seek comment on this proposal.

**G. Calling Party Identification Requirement.**

76. Section 64.604(b)(6) currently requires that when a TRS facility is capable of transmitting calling party identifying information, it must pass through, to the called party, at least one of three options: the number of the TRS facility, 711, or the 10-digit number of the calling party.<sup>150</sup> This requirement was initially established to ensure that a called party subscribing to Caller ID could, at a minimum, identify the incoming call as being from a TRS facility, which helped prevent the rejection of calls that might otherwise display as blocked or unavailable.<sup>151</sup> We propose to amend this rule by eliminating the phrase, "the number of the TRS facility," as this option has become superfluous. For TRS providers that route calls as a part of providing their service the functional equivalency mandate is best met by transmitting to the called party the caller's specific 10-digit number, if one is assigned, or (if no number is assigned to the caller) by providing the universal 711 code. For call recipients, 711 is easily identified as the number for TRS call centers, while the telephone number assigned to a TRS facility is often unadvertised and not readily distinguishable from other 8XX toll-free telephone numbers. We believe the continued inclusion of the generic TRS facility number option appears unnecessary and inconsistent with modern TRS numbering standards, and its removal will clarify the emphasis on providing the most accurate identification information possible. We seek comment on this proposal and belief.

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<sup>146</sup> 47 CFR § 64.604(c)(8)(i), (v). Section (c)(8) also prohibits IP CTS providers from offering or providing any direct or indirect incentives to hearing health professionals that are tied to a consumer's decision to register for or use IP CTS and prohibit joint marketing agreements between IP CTS providers and hearing health professionals. 47 CFR § 64.604(c)(8)(ii)-(iv). We do not propose to change the applicability of those provisions.

<sup>147</sup> See *Structure and Practices of the Video Relay Service Program; Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities*, CG Docket Nos. 10-51 and 03-123, Report and Order and Further Notice of Proposed Rulemaking, 34 FCC Rcd 3396, 3414-17, paras. 33-37 (2019) (*2019 VRS Program Management Order*).

<sup>148</sup> *Id.*

<sup>149</sup> See *Analog TRS Modernization Notice*, paras. 29-31 (RTT-based relay service), 51 (IP STS and Video-Assisted STS).

<sup>150</sup> 47 CFR § 64.604(b)(6).

<sup>151</sup> *Telecommunication Relay Services and Speech-To-Speech Services for Individuals With Hearing and Speech Disabilities, Telecommunications Relay*, CG Docket Nos. 98-67, Second Report and Order, Order on Reconsideration, and Notice of Proposed Rulemaking, 18 FCC Rcd 12379, 12395, para. 25 (2003) (*2003 TRS Order*).



## H. Updating or Deleting Obsolete or Unnecessary Rules

77. 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; create burdensome and unnecessary record retention, reporting obligations, or disclosures; govern a time period that has passed; or contain duplicative or superfluous language. We also propose to make technical corrections to correct cross cites to other rules. We seek comment on these proposals and the questions, beliefs, and assumptions stated below.

78. *Automatic Call Distribution Platform.* Section 64.604(b)(4)(iv) mandates that if an Automatic Call Distribution (ACD) platform is leased or licensed between two eligible VRS providers, the lessee or licensee must locate the ACD platform on its own premises and utilize its own employees to manage the ACD platform.<sup>152</sup> We believe retaining this restriction may be unduly burdensome on operational flexibility. While intended as a safeguard against the types of unlawful activities seen on the part of many white label providers,<sup>153</sup> we believe that the current VRS program structure, which encourages competition among providers, reduces the need to explicitly require VRS providers to locate the ACD platform on its premises and utilize its own employees. We believe it is sufficient to rely on the requirements that VRS providers enter into a written lease for an ACD platform and that the lease must not include compensation of the lessor by the lessee related to minutes of use or revenue sharing agreements between the lessor and the lessee.<sup>154</sup> Thus, we propose to delete the last sentence of Section 64.604(b)(4)(iv).<sup>155</sup> We seek comment on this proposal. Would it be beneficial to retain this specific restriction? If so, what are the costs and benefits of doing so?

79. *VRS Access Technology Reference Platform.* Section 64.619 provides for the availability and administration of a “VRS Access Technology Reference Platform” (Technology Reference Platform),<sup>156</sup> defined as a software product that “performs consistently with the rules in this part,” including the technical standards for VRS interoperability and portability incorporated in section 64.621 of the rules.<sup>157</sup> By establishing a Technology Reference Platform, the Commission intended to provide a means of ensuring that VRS providers comply with the interoperability and portability standards contained in section 64.621.<sup>158</sup> Section 64.621(a)(3) requires VRS providers to ensure that their access technologies and video communication service platforms are interoperable with the Technology Reference Platform and prohibits compensation of VRS providers for minutes of use involving non-interoperable access technologies or video communication service platforms that are not interoperable with the Technology Reference Platform.<sup>159</sup> In March 2020, the Commission suspended the compliance deadline requiring VRS interoperability with the Technology Reference Platform pending completion of the standards development process for a VRS provider-to-user-device communications standard and a

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<sup>152</sup> 47 CFR § 64.604(b)(4)(iv). The ACD platform is recognized as hardware and/or software that performs the essential function of call distribution and is a core component of Internet-based TRS. See *2013 VRS Reform Order*, 28 FCC Rcd at 8657, n.214.

<sup>153</sup> *Structure and Practices of the Video Relay Service Program*, CG Docket No. 10-51, Second Report and Order and Order, 26 FCC Rcd 10898, 10906, paras. 17-19 (2011) (*2011 TRS Certification Order*)

<sup>154</sup> 47 CFR § 64.604(b)(4)(iv).

<sup>155</sup> The sentence we propose to delete currently reads, “In addition, if any such lease is between two eligible VRS providers, the lessee or licensee must locate the ACD platform on its own premises and must utilize its own employees to manage the ACD platform.” 47 CFR § 64.604(b)(4)(iv).

<sup>156</sup> 47 CFR § 64.619.

<sup>157</sup> 47 CFR § 64.619(a).

<sup>158</sup> 47 CFR § 64.621(b).

<sup>159</sup> 47 CFR § 64.621(a)(3).

rulemaking proceeding to incorporate such a standard into the rules.<sup>160</sup> Compliance with requirement remains pending. Following its initial development, the Technology Reference Platform was decommissioned by its administrator, and the Commission has not pursued redevelopment of the platform. We propose to eliminate the requirement to be interoperable with the Technology Reference Platform<sup>161</sup> and delete the related rules for its establishment and administration.<sup>162</sup> We seek comment on this proposal.

80. *Single URL Address.* Section 64.604(d)(1)(ii) requires that VRS service must be offered under the certified provider's name or clearly identified sub-brand, and specifically mandates that “[p]roviders must route all VRS calls through a single URL address used for each name or sub-brand used.”<sup>163</sup> This requirement was initially intended to reinforce provider identity and help maintain regulatory oversight, in part by preventing the delegation of call center functions and ensuring calls were not routed through multiple, potentially unauthorized URLs to mask misuse. The Commission adopted this rule in part because it found that the complex branding and commercial relationships that had previously existed between eligible and ineligible VRS providers hindered consumers from making informed choices among VRS providers.<sup>164</sup> We propose to amend this rule by deleting the phrase, “Providers must route all VRS calls through a single URL address used for each name or sub-brand used.” We believe this specific routing limitation has become obsolete and unnecessarily burdensome in the current technical environment. The Commission now supports the VRS Provider Interoperability Profile, which enables server-based routing using provider domain names recorded in the TRS Numbering Directory.<sup>165</sup> This protocol helps ensure that each NANP telephone number in the TRS Numbering Database is connected to a unique Uniform Resource Identifier with a server domain name for the VRS provider, allowing for the provider to be identified, even if multiple IP addresses are used.<sup>166</sup> Further, VRS providers only complete calls with domain or IP addresses that are found in the TRS Numbering Directory.<sup>167</sup> Furthermore, our comprehensive suite of measures to prevent waste, fraud, and abuse provides robust oversight regardless of the specific URL structure, including user registration and validation requirements and Call Detail Record reporting requirements that capture critical technical data necessary for audit purposes, such as IP addresses.<sup>168</sup> Therefore, retaining this specific phrase appears unnecessary given the current technical reliance on domain names for routing and the enhanced accountability provided by other regulatory requirements. We seek comment on this belief.

81. *Interoperability with the Neutral Video Communication Service Platform.* Section 64.621(a)(4) requires that all VRS providers ensure their VRS access technologies and video communication service platforms are interoperable with the Neutral Video Communication Service

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<sup>160</sup> *Structure and Practices of the Video Relay Service Program; Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities*, CG Docket No. 10-51, 03-123, Order on Reconsideration and Order Suspending Compliance Deadline, 35 FCC Rcd 1878 (CGB 2020).

<sup>161</sup> 47 CFR § 64.621(a)(3).

<sup>162</sup> 47 CFR §§ 64.619 (defining the VRS Access Technology Reference Platform and its administration); 64.623(a), (b)(4) (provisions that include the administrator of the VRS Access Technology Reference Platform within administrator requirements).

<sup>163</sup> 47 CFR § 64.604(d)(1)(ii).

<sup>164</sup> *See Structure and Practices of the Video Relay Service Program; Internet-based TRS Certification Application of Healinc Telecom, LLC*, CG Docket No. 10-51, Order, 28 FCC Rcd 1381, 1384, n.24 (2013).

<sup>165</sup> 47 CFR § 64.621.

<sup>166</sup> 47 CFR § 64.613(a)(2).

<sup>167</sup> 47 CFR § 64.613(a)(5).

<sup>168</sup> 47 CFR §§ 64.604(c)(5)(iii)(D) (call detail records), 64.613 (TRS User Registration Database).

Platform (Neutral VRS Platform).<sup>169</sup> This requirement mandated compatibility with a centralized platform intended to handle non-core functions like call routing, thereby enabling efficient competition among providers who would focus primarily on CA services.<sup>170</sup> We propose to delete Section 64.621(a)(4) in its entirety because the underlying technology it governs was never successfully implemented, making the provision obsolete and unnecessary.<sup>171</sup> Maintaining a specific requirement to ensure interoperability with a service platform that does not exist constitutes mere surplusage and imposes an unnecessary standard that cannot be met. We seek comment on this proposal.

82. *Administrator Requirements.* Section 64.623(a) defines the term “Administrator” for purposes of that section by consolidating references to the administrator of the TRS Numbering Directory, the administrator of the TRS User Registration Database, the administrator of the VRS Access Technology Reference Platform, and the provider of the Neutral Video Communication Service Platform.<sup>172</sup> We propose to delete the phrases referencing the “administrator of the VRS Access Technology Reference Platform” and the “provider of the Neutral Video Communication Service Platform” from paragraph (a) and removing related references in paragraph (b)(4),<sup>173</sup> as these administrative functions govern platforms that were never successfully developed.<sup>174</sup> Given that the platforms themselves do not exist or are not operational, retaining specific regulatory language that mandates the inclusion of their administrators in this definition is unnecessary surplusage.

83. *Consumer Complaint Logs.* Section 64.604(c)(1) requires state TRS programs and TRS providers to maintain a detailed log of consumer complaints alleging violations of federal mandatory minimum standards.<sup>175</sup> It also requires that providers submit annual summaries of these logs to the Commission by July 1st of each year, indicating the number of complaints received.<sup>176</sup> This rule is intended to assist the Commission in monitoring compliance trends and whether further inquiry or actions requiring coordinated solutions are needed.<sup>177</sup> With the growth of Internet-based TRS and the availability of alternative oversight tools, we believe the burden to state TRS programs and TRS providers in submitting annual summaries of these logs to the Commission outweighs the benefit from this required submission.<sup>178</sup> We propose to eliminate the requirement to submit summaries of the complaint logs, while retaining the requirement to maintain complaint logs, and instead require that complaint logs be provided to the Commission upon request. We seek comment on this proposal and belief.

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<sup>169</sup> 47 CFR § 64.621(a)(4).

<sup>170</sup> 2013 VRS Reform Order, 28 FCC Rcd at 8657, para. 89.

<sup>171</sup> See *Structure and Practices of the Video Relay Service Program; Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities*, CG Docket Nos. 10-51, 03-123, 32 FCC Rcd 5891, 5930-31, paras. 74-76 (2017).

<sup>172</sup> 47 CFR § 64.623(a).

<sup>173</sup> 47 CFR § 64.623(b)(4).

<sup>174</sup> See *supra*.

<sup>175</sup> 47 CFR § 64.604(c)(1)(i).

<sup>176</sup> 47 CFR 64.604(c)(1)(ii).

<sup>177</sup> 2000 VRS Order, 15 FCC Rcd at 5190-91, para. 122 (2000).

<sup>178</sup> We also note several comments filed in Docket 25-133 (In Re: Delete, Delete, Delete) on the issue of annual consumer complaint summaries. See ZP Better Together Comments, GN 25-133, at 6-7 (rec. Apr. 11, 2025) (recommending elimination of the annual complaint summaries requirement); ClearCaptions Reply Comments, GN 25-133, at 3 (rec. Apr. 29, 2025) (same); Nagish Reply Comments, GN 25-133, at 4-5 (rec. Apr. 14, 2025) (quarterly complaint logs for conditionally certified providers are not necessary and redundant); Accessibility Organizations Reply Comments, GN 25-133, at 15 (rec. Apr. 28, 2025) (opposing elimination of the annual complaint summaries requirement).

84. *Specific Contact Information.* Section 64.604(c)(2) requires state TRS programs, interstate TRS providers, and TRS providers with state contracts submit specific contact information to the Commission for handling consumer inquiries and complaints.<sup>179</sup> The existing rule details this submission through mandatory subparagraphs requiring, at a minimum, the name and address of the office receiving complaints; voice, TTY, fax, e-mail, and web addresses; and the separate physical address for correspondence. We believe retaining a fixed list of communication methods can become unnecessarily burdensome when certain formats become obsolete, such as the mandatory inclusion of a fax number and we propose to delete in its entirety the exhaustive list of specific minimum requirements detailed in paragraphs (i), (ii), and (iii) of § 64.604(c)(2).<sup>180</sup> To streamline this administrative requirement while preserving consumer access, we propose revising the introductory text of paragraph (c)(2) to generally require the submission of information necessary for consumer contact and complaint resolution (e.g., telephone number and email address), thereby giving providers flexibility to update their communication channels without adherence to an overly prescriptive checklist. We seek comment on this proposal and belief.

85. *Public Awareness Methods.* Section 64.604(c)(3) establishes requirements for common carriers providing telephone voice transmission services to ensure that callers in their service areas are aware of the availability and use of all forms of TRS.<sup>181</sup> Specifically, this rule requires carriers to assure public awareness through a prescriptive listing of methods such as publication in their directories, periodic billing inserts, placement of TRS instructions in telephone directories, through directory assistance services, and the incorporation of TTY numbers in telephone directories. We propose to delete section 64.604(c)(3) because this provision is largely obsolete and unnecessarily burdensome in today's rapidly evolving communications environment. Originally adopted in 1991 to reflect prevailing methods of public information dissemination,<sup>182</sup> these specific requirements appear outdated now, in light of the transition to IP-based networks and decline in the use of analog relay services like TTY-based Relay.<sup>183</sup> Further, the Commission has previously raised concerns about the effectiveness of such methods as directories and bill inserts in achieving widespread public awareness of TRS.<sup>184</sup> We seek comment on this proposal and belief. Are common carriers best positioned to raise awareness about modern TRS services? Should we revise section 64.604(c)(3) to require common carriers to share information about TRS with their subscribers in a modern, flexible way that is more aligned with modern practices? Are common carriers already raising awareness about TRS in modern ways? If so, how do common carriers ensure public awareness of TRS?

86. *TRS Advisory Council.* Among other provisions, section 64.604(c)(5)(iii)(H) directs the Administrator to establish a voluntary group (known as the TRS Advisory Council) consisting of diverse stakeholders, to monitor TRS cost recovery matters.<sup>185</sup> We propose to delete this requirement. In adopting its proposal to select the National Exchange Carrier Association (NECA) as the original TRS Fund administrator, the Commission also adopted the recommendation to establish an advisory committee

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<sup>179</sup> 47 CFR § 64.604(c)(2).

<sup>180</sup> 47 CFR § 64.604(c)(2)(i)-(iii).

<sup>181</sup> 47 CFR § 64.604(c)(3).

<sup>182</sup> *Telecommunications Services for Individuals with Hearing and Speech Disabilities and the Americans with Disabilities Act*, CC Docket No. 90-571, Report and Order and Request for Comments, 6 FCC Rcd 4657, 4663, para. 28 (1991).

<sup>183</sup> See e.g. *Analog TRS Modernization Notice* at paras. 9-18.

<sup>184</sup> See *2003 TRS Order*, 18 FCC Rcd at 12441, paras. 128-129 (noting that these methods may not be fully effective in ensuring that the public is aware of TRS).

<sup>185</sup> 47 CFR § 64.604(c)(5)(iii)(H).

to monitor TRS cost recovery issues.<sup>186</sup> The Commission found merit in the proposal for an advisory committee to monitor TRS issues and provide guidance to the Fund administrator<sup>187</sup> and believed it would help serve as a safeguard (among other requirements) to address concerns associated with the administrator's association with local exchange carriers and its alleged inability to control administrative costs.<sup>188</sup>

87. We recognize that since its inception, the TRS Advisory Council has served an informative role in advising the TRS Fund administrator, and the Commission benefits from direct consultation with TRS stakeholders and accessibility community representatives.<sup>189</sup> We question, however, whether the same benefits can be proffered by a less regulated mechanism. Is a direct regulatory requirement, which is not statutorily mandated and which limits both the scope of and makeup of the TRS Advisory Council, the appropriate mechanism for facilitating advisory input by stakeholders?<sup>190</sup> Further, the process for how the Commission monitors TRS and establishes compensation has evolved substantially in the 33 years since the TRS Advisory Council was established. The Commission now selects the Fund administrator through a competitive procurement process.<sup>191</sup> Furthermore, the Council's narrow focus on TRS cost recovery, as written in the rule, is less critical today, given the Commission's assumption of a more active role in setting TRS compensation and the various oversight, monitoring, and auditing tools used by the Commission and the Fund administrator. In using the rulemaking process, the Commission affords the opportunity for individuals with disabilities and organizations representing such groups to actively participate and provide feedback on TRS compensation and how to structure and change the TRS program to ensure the Commission is meeting its statutory obligations. The Commission also uses the statutory Federal Advisory Committee process to procure recommendations on TRS and other accessibility issues while ensuring transparency, public involvement, and accountability.<sup>192</sup> We also have included within the scope of work, for entities working at the Commission's direction, the ability or requirement to form working groups or otherwise involve a

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<sup>186</sup> *Telecommunications Relay Services and the Americans with Disabilities Act of 1990*, CC Docket No. 90-571, Third Report and Order, 8 FCC Rcd 5300, 5301, paras. 4, 8 (1993) (*Third TRS Report and Order*). NCLD, NARUC, and Robinson, in their comments, proposed the creation of advisory council to monitor interstate TRS compliance and address telecommunications issues related to TRS. *Id.* at 5301, para. 4. The scope adopted and codified by the Commission was much narrower, limiting the scope to TRS cost recovery issues. *Id.* at 5301, para. 4; 47 CFR § 64.604(c)(5)(iii)(H).

<sup>187</sup> *Third TRS Report and Order*, 8 FCC Rcd at 5301, para. 8; Letter from Zainab Alkebsi, Chief Policy Office, Deaf Equality, and Jan Withers, Chair and Acting CEO, TDIforAccess, to Marlene Dortch, Secretary, FCC, CG Docket Nos 03-123, 10-51, and 12-38, at 2-3 (filed Jan. 21, 2026) (Accessibility Organizations *Ex Parte*).

<sup>188</sup> *Third TRS Report and Order* 8 FCC Rcd 5300, 5301, paras. 5, 7-8.

<sup>189</sup> *See 2013 VRS Reform Order*, 28 FCC Rcd at 8712, para. 244; Accessibility Organizations *Ex Parte* at 3.

<sup>190</sup> The Commission has on multiple occasions sought through the rulemaking process to dissolve, reform, or replace the Council because of changes in the TRS program were viewed outside of the Council scope because of the inflexibility of codifying its nature, composition, and functions. *See 2013 VRS Reform Order*, 28 FCC Rcd at 8712-8714, paras. 244-248; *Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities*, CC Docket No. 90-571, 98-67, CG Docket No. 03-123, Report and Order, Order on Recommendation, and Further Notice of Proposed Rulemaking, 19 FCC Rcd 12475, 12570-71, paras. 251-254 (2004).

<sup>191</sup> *See e.g. 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, 26 FCC Rcd 9972, 9975, para. 8 (2011) (awarding the TRS Fund Administrator contract to Rolka Loube Saltzer Associates, LLC, after a competitive procurement process).

<sup>192</sup> The Commission currently receives guidance and recommendations relating to accessibility and the needs and interests of consumers from the Consumer Protection and Accessibility Advisory Committee (CPAAC) and previously received such guidance from its prior advisory committees, including the Consumer Advisory Committee and the Disability Advisory Committee.

diverse group of stakeholders to inform and provide guidance without imposing a specific structure on such processes. As such, we believe the cost and administrative burden of maintaining the TRS Advisory Council outweighs its benefits. We seek comment on this proposal and beliefs. Are there benefits to retaining the TRS Advisory Council? We seek comment on how the TRS Advisory Council has benefitted the TRS Fund administrator and the Commission. Are those benefits distinguishable from the benefits received from established Federal Advisory Committees or the Commission rulemaking process? What has been the impact of explicitly identifying certain groups for membership on the Council? Has the stated purpose of monitoring “TRS cost recovery matters” limited the guidance the Council has been able to provide? Would allowing or requiring the TRS Fund administrator to maintain an advisory council within its scope of work, without a separate rule, sufficiently maintain any identified benefits of the Council?

88. *Call Centers.* Section 64.604(d)(2) mandates that VRS providers file detailed written reports for each physical call center, including centers located outside the United States, with the Commission and the TRS Fund Administrator on April 1st and October 1st of every year, detailing information such as the facility’s complete street address, the number of CAs and their managers, and the managers’ contact information.<sup>193</sup> In addition, VRS providers must notify the Commission and the TRS Fund Administrator at least 30 days prior to the opening, closing, or relocation of any call center.<sup>194</sup> We propose to delete section 64.604(d)(2), eliminating the requirement for call center reports and the 30-day advance notice requirement. In light of other Commission rules and measures to ensure effective oversight, fund administration, and accountability, we believe the requirement for call center reports may be eliminated without an adverse impact on the Commission’s ability to prevent waste, fraud, and abuse of the TRS Fund.<sup>195</sup> We also believe elimination of the 30-day advance notice period for facility changes would provide operational flexibility necessary in a modern communications industry. We seek comment on this proposal and these beliefs. Are there aspects of the reporting requirement, we should retain, such as the location of each call center or just those call centers located outside of the United States? If so, should we reduce the frequency of reporting for any retained requirements to once per year? Should we find that the opening, closing, or relocating of a call center constitutes a substantive change, and thereby require a provider to notify the Commission within 60 days after such a change, to ensure that the Commission is able to maintain a complete and accurate list of call center locations for each provider, for auditing and other oversight purposes?

89. *Monitoring of At-Home Workstations.* Section 64.604(d)(7)(vi) requires that, with their monthly requests for compensation, VRS providers report home work station identification number and full street address; the CA identification number of each individual handling VRS calls from that home workstation; and the call center identification number, street address, and name of the supervisor of the call center responsible for oversight of the workstation.<sup>196</sup> We propose to eliminate these monthly reporting requirements. We believe the data in these reports is duplicative of the data providers are required to submit in the monthly call detail records.<sup>197</sup> We seek comment on this proposal and belief. Are there any data or information collected in these monthly reports that we should add to the rules requiring call detail records?

90. *Long-Past Dates.* Sections 64.604, 64.611, and 64.621 contain numerous prescriptive references to long-past implementation dates, compliance deadlines, and transitional periods that initially governed various elements of the TRS program. We propose eliminating this historical information, as it has become obsolete and constitutes surplusage, detracting from the clarity of the current regulatory

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<sup>193</sup> 47 CFR § 64.604(d)(2).

<sup>194</sup> 47 CFR § 64.604(d)(2)(iii).

<sup>195</sup> See, e.g., 47 CFR § 64.604(c)(5)(iii)(D); 64.604(d)(7).

<sup>196</sup> 47 CFR § 64.604(d)(7)(vi).

<sup>197</sup> 47 CFR § 64.604(c)(5)(iii)(D)(2).

obligations. Specifically, we propose deleting foundational and transitional date language from cost recovery rules found in § 64.604(c)(5): the original TRS implementation date “Effective July 26, 1993;”<sup>198</sup> the start date phrases “(beginning July 1, 2023)”<sup>199</sup> regarding the commencement of expanded TRS Fund contributions supporting VRS and IP Relay; and in § 64.604(c)(7) the start date phrase (“Beginning on July 21, 2000, all future”). Similarly, the transitional compliance phrase “On or after December 8, 2018,” which set the deadline for IP CTS equipment volume controls to be independently adjustable, is now redundant.<sup>200</sup> We further propose deleting the phrase “Beginning October 17, 2024,” marking the effective date for the permanent 80% cap on at-home VRS CA minutes.<sup>201</sup> Finally, we propose to update the VRS interoperability rules by removing the original compliance phrases “Beginning no later than December 20, 2017,”<sup>202</sup> and “Beginning no later than October 24, 2017”<sup>203</sup> as these compliance deadlines have passed.

91. *Authorization of At-Home Service.* Section 64.604(b)(4)(iii) prohibits VRS providers from allowing CAs to handle calls from home workstations unless the provider was specifically authorized by the Commission.<sup>204</sup> We propose to delete this rule in its entirety. We believe this provision is now obsolete and superfluous, as the prohibition and its exception are entirely superseded by the current regulatory framework governing at-home VRS call handling.<sup>205</sup> As a conforming change, we also propose to delete the language in section 64.604(d)(7)(i) that references VRS providers “authorized by the Commission to employ at-home CAs.”<sup>206</sup> The continuous nature of this authorized service means that the generalized prohibition in section 64.604(b)(4)(iii) is no longer necessary, as authorization and ongoing oversight are now comprehensively integrated into the provider certification and compliance requirements.<sup>207</sup> We seek comment on this proposal and its underlying rationale.

92. *Duplicative Audit Authority.* Section 64.604(c)(5)(iii)(E)(5) grants the Commission authority to audit TRS providers and ensure access to all data collected by the TRS Fund administrator, concurrently affirming the Fund administrator’s authority to perform audits of TRS providers reporting data to it.<sup>208</sup> We propose to delete this provision in its entirety because this audit authority is comprehensively provided elsewhere in our regulations, rendering this section unnecessary and duplicative. Specifically, a different mandate for stringent financial oversight explicitly grants the Fund administrator, the Commission, and the Office of Inspector General (OIG) the authority to examine and verify TRS provider data as necessary to assure the accuracy and integrity of TRS Fund payments.<sup>209</sup> Further, that same provision mandates that TRS providers must submit to audits annually or at times determined appropriate. Since these requirements already ensure that the Commission maintains robust

<sup>198</sup> 47 CFR § 64.604(c)(5)(iii). We also propose to delete the obsolete interim administrator language in the same paragraph, since the Commission now selects the Fund administrator through a competitive procurement process.

<sup>199</sup> 47 CFR § 64.604(c)(5)(ii), (c)(5)(iii)(A)(I)(ii).

<sup>200</sup> 47 CFR § 64.604(c)(10)(ii).

<sup>201</sup> 47 CFR § 64.604(d)(7)(i).

<sup>202</sup> 47 CFR § 64.621(b)(1).

<sup>203</sup> 47 CFR § 64.621(b)(2).

<sup>204</sup> 47 CFR § 64.604(b)(4)(iii).

<sup>205</sup> 47 CFR § 64.604(d)(7).

<sup>206</sup> 47 CFR § 64.604(d)(7).

<sup>207</sup> 47 CFR § 64.606(a)(4).

<sup>208</sup> 47 CFR § 64.604(c)(5)(iii)(E)(5).

<sup>209</sup> 47 CFR § 64.604(c)(5)(iii)(D)(6).

access and verification authority over all provider data and audit processes, the continued retention of Section 64.604(c)(5)(iii)(E)(5) constitutes surplusage. We seek comment on this proposal.

93. *Duplicative Certification Requirement.* Section 64.604(c)(5)(iii)(I) contains a requirement for the certification of compensation requests or provider reports by a senior executive, similar to the provision stipulating that the chief executive officer (CEO), chief financial officer (CFO), or other senior executive must certify under penalty of perjury that cost and demand data submitted for reimbursement from the TRS Fund are true and accurate.<sup>210</sup> We propose to delete this portion because the requirement for executive certification regarding the truthfulness, accuracy, and completeness of financial and operational data already exists within the immediate administrative subsection detailing data collection and auditing.<sup>211</sup> We seek comment on this proposal.

94. *Complaint Procedures.* Section 64.604(c)(6)(v) sets forth informal and formal consumer complaint procedures against TRS providers.<sup>212</sup> The subsequent detailed subparagraphs (A) through (I) lays out the specific administrative procedures governing these processes, including the acceptable forms for filing informal complaints (such as letter, facsimile, telephone (voice/TRS/TTY), or Internet e-mail), the precise content required for formal complaints, detailed service protocols, and mandated deadlines for filing answers and replies.<sup>213</sup> These rules overlap with and often conflict with the rules for handling both informal and formal complaints generally applicable to all regulated entities, in Part 1, subpart E of the Commission's rules.<sup>214</sup> Consequently, we propose to cross reference these complaint procedures, which would streamline our regulations, reduce administrative burden, and ensure that the process for resolving TRS complaints aligns efficiently with the unified regulatory and administrative framework. We seek comment on this proposal.

95. *At-Home Call Handling.* Section 64.604(d)(7)(iii)(B) and (C) currently mandate specific technical and environmental safeguards for at-home VRS call handling.<sup>215</sup> Specifically, paragraph (B) requires that home workstations "Allow a CA to use all call-handling technology to the same extent as call-center CAs", and paragraph (C) requires that the home workstation "Be capable of supporting VRS in compliance with the applicable mandatory minimum standards set out in this section to the same degree as at call centers." We propose to delete these two provisions because they are duplicative of the encompassing requirements already set forth elsewhere in this section and other mandatory minimum standards. The introductory text already requires VRS providers to ensure that each home workstation enables the provision of confidential and uninterrupted service to the same extent as the provider's call centers and is seamlessly integrated into the provider's call routing, distribution, tracking, and support systems.<sup>216</sup> It also requires that each home workstation meet the applicable mandatory minimum technical and emergency call handling standards "to the same degree as these are available at call centers."<sup>217</sup> Maintaining separate provisions that merely reiterate these core performance expectations constitutes surplusage. We seek comment on this proposal.

96. *TRS Numbering Directory and TRS User Registration Database Administration.* Section 64.613(b) concerns the administrative requirements and compensation procedures for the administrator

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<sup>210</sup> 47 CFR § 64.604(c)(5)(iii)(I).

<sup>211</sup> 47 CFR § 64.604(c)(5)(iii)(D)(5).

<sup>212</sup> 47 CFR § 64.604(c)(6)(v).

<sup>213</sup> 47 CFR § 64.604(c)(A)-(I).

<sup>214</sup> See 47 CFR §§ 1.716-1.719 (informal complaints), 1.720-1.735 (formal complaints).

<sup>215</sup> 47 CFR § 64.604(d)(7)(iii)(B)-(C).

<sup>216</sup> 47 CFR § 64.604(d)(7)(iii).

<sup>217</sup> *Id.*



responsible for maintaining the TRS Numbering Directory.<sup>218</sup> We propose to delete this provision in its entirety because its administrative and compensation requirements are duplicative of the consolidated rules set forth in section 64.623. We similarly propose to delete section 64.615(b) because the administrative and compensation requirements for the administrator of the User Registration Database are duplicative of the consolidated rules set forth in section 64.623.<sup>219</sup> Section 64.623 defines a unified set of requirements—including rules governing neutrality, terms of administration, and compensation—applicable to all designated TRS administrators, explicitly naming the TRS Numbering and the administrator of the TRS User Registration Database.<sup>220</sup> Therefore, retaining separate, dedicated administrative provisions within section 64.613(b) constitutes unnecessary surplusage that needlessly complicates the regulatory structure.

97. *IP CTS Labeling Requirements.* Section 64.604(c)(11) contains rules governing IP CTS user devices, including prohibitions on captions usage by unregistered users and device labeling requirements.<sup>221</sup> We propose deleting or revising sections (c)(11)(ii)(B), (iii), and (iv) to remove transitional language governing passed time periods or utilizing obsolete cross-references. Specifically, we propose to delete paragraph (c)(11)(ii)(B) in its entirety, as it contains transitional registration requirements applicable to IP CTS users existing as of March 7, 2013, and make conforming changes to paragraph (11)(ii).<sup>222</sup> The IP CTS registration framework was subsequently consolidated under Section 64.611, rendering the provisional registration language and cross-reference obsolete.<sup>223</sup> We also propose deleting the second sentence of paragraph (c)(11)(iii), which set a non-recurrent compliance date for providers to distribute labels for previously supplied equipment no later than August 11, 2014.<sup>224</sup> Since this deadline has long passed, the sentence is surplusage. We further propose to delete paragraph (c)(11)(iv), requiring providers to maintain records of provided IP CTS equipment and stating whether the label was affixed.<sup>225</sup> We believe the record retention requirement provides minimal benefit towards ensuring compliance with the labeling requirement. We also propose to delete paragraph (c)(11)(v) requiring providers to ensure that their informational materials and websites include language about the limitations on the use of IP CTS. We believe that IP CTS providers should have more flexibility in their informational materials and websites to inform consumers and professionals about IP CTS while meeting their obligations to prevent misuse of IP CTS. As such, we believe it is unnecessary to require repetitive labeling information that users will see on their device or when they log onto the app. Providers have sufficient incentive to ensure that users know how the service is provided and who may use the service, without the additional explicit directive. We seek comment on these beliefs.

98. *Correcting Cross Cites.* We propose to correct inaccurate cross-references in the TRS rules. First, section 64.604(c)(5)(iii)(E)(3) has an outdated cross reference to “paragraph (c)(5)(iii)(C).”<sup>226</sup> We propose to amend this rule to correct this cross-reference, to paragraph (c)(5)(iii)(D).<sup>227</sup> Second,

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<sup>218</sup> 47 CFR § 64.613(b).

<sup>219</sup> 47 CFR § 64.615(b).

<sup>220</sup> 47 CFR § 64.623.

<sup>221</sup> 47 CFR § 64.604(c)(11).

<sup>222</sup> 47 CFR § 64.604(c)(11)(ii).

<sup>223</sup> 47 CFR § 64.611(j).

<sup>224</sup> 47 CFR § 64.604(c)(11)(iii).

<sup>225</sup> 47 CFR § 64.604(c)(11)(iv).

<sup>226</sup> 47 CFR § 64.604(c)(5)(iii)(E)(3).

<sup>227</sup> 47 CFR 64.604(c)(5)(iii)(D).

section 64.615(a)(4)(ii)(B) has an incorrect cross reference to paragraph (a)(3)(i).<sup>228</sup> We propose to correct this cross-reference to Section 64.615(a)(4)(i).<sup>229</sup> We seek comment on these proposals.

#### **I. Closing CG Docket Nos. 10-51 and 12-38**

99. We seek comment on closing CG Docket Nos. 10-51, Structure and Practices of the Video Relay Service; and 12-38, Misuse of Internet Protocol Relay Service. The Commission previously conducted proceedings in these dockets in parallel with CG Docket No. 03-123. In seeking to develop a fresh record on VRS and IP Relay, we do not see a need to maintain a separate duplicative record, and we believe closing these dockets eliminates a duplicative filing requirement that unnecessarily burden commenters, and could lead to unnecessary confusion. We seek comment on this belief.

#### **IV. PROCEDURAL MATTERS**

100. *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.

101. *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](mailto:fcc504@fcc.gov) or call the Consumer & Governmental Affairs Bureau at 202-418-0530 (voice).

102. *Ex Parte Rules.* This proceeding shall be treated as a "permit-but-disclose" proceeding in accordance with the Commission's *ex parte* rules.<sup>230</sup> 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

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<sup>228</sup> 47 CFR 64.615(a)(4)(ii)(B).

<sup>229</sup> 47 CFR § 615(a)(4)(i).

<sup>230</sup> See 47 CFR §§ 1.1200 *et seq.*

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).<sup>231</sup> Participants in this proceeding should familiarize themselves with the Commission's *ex parte* rules.

103. *Regulatory Flexibility Act.* The Regulatory Flexibility Act of 1980, as amended (RFA),<sup>232</sup> 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."<sup>233</sup> 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.

104. *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.<sup>234</sup> 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.<sup>235</sup>

105. *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>.

106. *Further Information.* For further information regarding this proceeding, contact Joshua Mendelsohn, CGB, Disability Rights Office, (202) 559-7304, e-mail [Joshua.Mendelsohn@fcc.gov](mailto:Joshua.Mendelsohn@fcc.gov).

## V. ORDERING CLAUSES

107. 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.<sup>236</sup>

108. 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

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<sup>231</sup> *Id.* § 1.1206(b).

<sup>232</sup> 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).

<sup>233</sup> *Id.* § 605(b).

<sup>234</sup> 44 U.S.C. §§ 3501-3521.

<sup>235</sup> *Id.* § 3506(c)(4).

<sup>236</sup> 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).

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.

109. IT IS FURTHER ORDERED that the Commission's Office of the Secretary, SHALL SEND a copy of this Further 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

## APPENDIX A PROPOSED RULES

Deleted text is marked with a ~~strikethrough~~. Added text is marked with an underline.

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 (b)(4)(iv), (b)(6), (c)(1), (c)(2), (c)(5)(ii), (c)(5)(iii), (c)(5)(iii)(A)(i)(ii), (c)(5)(iii)(E)(3), (c)(5)(iii)(H), (c)(5)(iii)(I), (c)(6), (c)(7), (c)(8), (c)(8)(v)-(vi), (c)(10)(ii), (c)(11), and (d)(1)(ii);
- b. remove and reserve paragraphs (b)(4)(iii), (c)(3), (c)(5)(iii)(E)(5), (c)(11)(ii)(A)-(B), (d)(7)(iii)(B)-(C), (c)(8)(i), (d)(2), and (d)(7)(i), (d)(7)(vi);

#### **§ 64.604 Mandatory minimum standards.**

\* \* \* \* \*

(b) \* \* \*

(4) \* \* \*

(iii) [Reserved]

(iv) A VRS provider leasing or licensing an automatic call distribution (ACD) platform must have a written lease or license agreement. Such lease or license agreement may not include any revenue sharing agreement or compensation based upon minutes of use. ~~In addition, if any such lease is between two eligible VRS providers, the lessee or licensee must locate the ACD platform on its own premises and must utilize its own employees to manage the ACD platform.~~

\* \* \* \* \*

(6) **Caller ID.** When a TRS facility is able to transmit any calling party identifying information to the public network, the TRS facility must pass through, to the called party, at least one of the following: ~~the number of the TRS facility, 711, or the 10-digit number of the calling party.~~

\* \* \* \* \*

(c) \* \* \*

(1) **Consumer complaint logs.** States and interstate providers must maintain a log of consumer complaints including all complaints about TRS in the state, whether filed with the TRS provider or the State, and must retain the log until the next application for certification is granted. The log shall include, at a minimum, the date the complaint was filed, the nature of the complaint, the date of resolution, and an explanation of the resolution.

(2) **Contact persons.** ~~Beginning on June 30, 2000, State TRS Programs, interstate TRS providers, and TRS providers that have state contracts must submit to the Commission a contact information, including a phone number and email, for the person and/or office responsible for TRS consumer information and complaints about a~~ the service provided by the certified State TRS Program's provision of intrastate TRS,

or, as appropriate, about the TRS provider's service. This submission must include, at a minimum, the following:

- (i) The name and address of the office that receives complaints, grievances, inquiries, and suggestions;
- (ii) Voice and TTY telephone numbers, fax number, e-mail address, and web address; and
- (iii) The physical address to which correspondence should be sent.

(3) [Reserved]

\* \* \* \* \*

(5) \* \* \*

(ii) **Cost recovery.** Costs caused by interstate TRS shall be recovered from all subscribers for every interstate service, utilizing a shared-funding cost recovery mechanism. Except as noted in this paragraph (c)(5)(ii), costs caused by intrastate TRS shall be recovered from the intrastate jurisdiction. In a state that has a certified program under § 64.606, the state agency providing TRS shall, through the state's regulatory agency, permit a common carrier to recover costs incurred in providing TRS by a method consistent with the requirements of this section. Costs caused by the provision of interstate and intrastate IP CTS, and (beginning July 1, 2023) for VRS, and IP Relay, if not provided through a certified state program under § 64.606, shall be recovered from all subscribers for every interstate and intrastate service, using a shared-funding cost recovery mechanism.

(iii) **Telecommunications Relay Services Fund.** Effective July 26, 1993, an Interstate Cost Recovery Plan, hereinafter referred to as the TRS Fund, shall be administered by an entity selected by the Commission (administrator). ~~The initial administrator, for an interim period, will be the National Exchange Carrier Association, Inc.~~

(A) \* \* \*

(I) \* \* \*

(ii) For the support of IP CTS, and (beginning July 1, 2023) for VRS, and IP Relay, on the basis of interstate and intrastate end-user revenues.

\* \* \* \* \*

(E) \* \* \*

(3) In addition to the data required under paragraph (c)(5)(iii)(C)(D) of this section, all TRS providers, including providers who are not interexchange carriers, local exchange carriers, or certified state relay providers, must submit reports of interstate TRS minutes of use to the administrator in order to receive payments.

\* \* \* \* \*

(5) [Reserved]

\* \* \* \* \*

(H) **Administrator reporting, monitoring, and filing requirements.** The administrator shall perform all filing and reporting functions required in paragraphs (c)(5)(iii)(A) through (c)(5)(iii)(JK) of this section. TRS payment formulas and revenue requirements shall be filed with the Commission on May 1 of each year, to be effective the following July 1. The administrator shall report annually to the Commission an itemization of monthly administrative costs which shall consist of all expenses, receipts, and payments associated with the administration of the TRS Fund. The administrator is required to keep the TRS Fund separate from all other funds administered by the administrator, shall file a cost allocation manual (CAM) and shall provide the Commission full access to all data collected pursuant to the administration of the TRS Fund. The administrator shall account for the financial transactions of the TRS Fund in accordance with generally accepted accounting principles for federal agencies and maintain the accounts of the TRS

Fund in accordance with the United States Government Standard General Ledger. When the administrator, or any independent auditor hired by the administrator, conducts audits of providers of services under the TRS program or contributors to the TRS Fund, such audits shall be conducted in accordance with generally accepted government auditing standards. In administering the TRS Fund, the administrator shall also comply with all relevant and applicable federal financial management and reporting statutes. ~~The administrator shall establish a non-paid voluntary advisory committee of persons from the hearing and speech disability community, TRS users (voice and text telephone), interstate service providers, state representatives, and TRS providers, which will meet at reasonable intervals (at least semi-annually) in order to monitor TRS cost recovery matters. Each group shall select its own representative to the committee. The administrator's annual report shall include a discussion of the advisory committee deliberations.~~

~~(I) **Information filed with the administrator.** The Chief Executive Officer (CEO), Chief Financial Officer (CFO), or other senior executive of a provider submitting minutes to the Fund for compensation must, in each instance, certify, under penalty of perjury, that the minutes were handled in compliance with section 225 of the Communications Act of 1934 and the Commission's rules and orders, and are not the result of impermissible financial incentives or payments to generate calls. The CEO, CFO, or other senior executive of a provider submitting cost and demand data to the TRS Fund administrator shall certify under penalty of perjury that such information is true and correct. The administrator shall keep all data obtained from contributors and TRS providers confidential and shall not disclose such data in company-specific form unless directed to do so by the Commission. Subject to any restrictions imposed by the Chief of the Consumer and Governmental Affairs Bureau, the TRS Fund administrator may share data obtained from carriers with the administrators of the universal support mechanisms (see § 54.701 of this chapter), the North American Numbering Plan administration cost recovery (see § 52.16 of this chapter), and the long-term local number portability cost recovery (see § 52.32 of this chapter). The TRS Fund administrator shall keep confidential all data obtained from other administrators. The administrator shall not use such data except for purposes of administering the TRS Fund, calculating the regulatory fees of interstate and intrastate common carriers and VoIP service providers, and aggregating such fee payments for submission to the Commission. The Commission shall have access to all data reported to the administrator, and authority to audit TRS providers. Contributors may make requests for Commission nondisclosure of company-specific revenue information under § 0.459 of this chapter by so indicating on the Telecommunications Reporting Worksheet at the time that the subject data are submitted. The Commission shall make all decisions regarding nondisclosure of company-specific information.~~

\* \* \* \* \*

(6) \* \* \*

(v) \* \* \*

(A) \* \* \*

(1) **Form.** An informal complaint may be transmitted to the Consumer & Governmental Affairs Bureau and shall contain the information required by § 1.716 ~~by any reasonable means, such as letter, facsimile transmission, telephone (voice/TRS/TTY), Internet e-mail, or some other method that would best accommodate a complainant's hearing or speech disability.~~

(2) [Reserved]

(3) **Service; designation of agents.** The Commission shall ~~promptly~~ forward any complaint ~~meeting the requirements of this subsection~~ to the TRS provider named in the complaint. Such TRS provider shall be called upon to satisfy or answer the complaint within the time specified by the Commission. Every TRS provider shall file with the Commission a statement designating an agent ~~or agents whose principal responsibility will be to receive all complaints, inquiries, orders, decisions, and notices and other pronouncements forwarded by the Commission.~~ Such designation shall include a name or department designation, business address, telephone number (voice and TTY), ~~facsimile number and, if available, internet e-mail address.~~

(B) \* \* \*

(1) Where it appears from the TRS provider's answer, or from other communications with the parties, that an informal complaint has been satisfied, the Commission may, in its discretion, consider the matter closed without response to the complainant or defendant. In all other cases, the Commission shall inform the parties of its review and disposition of a complaint filed under this subpart. ~~Where practicable, this information shall be transmitted to the complainant and defendant in the manner requested by the complainant (e.g., letter, facsimile transmission, telephone (voice/TRS/TTY) or Internet e-mail.~~

\* \* \* \* \*

(C) **Formal Complaints.** A formal complaint shall be in writing, addressed to the Federal Communications Commission, Enforcement Bureau, Telecommunications Consumer Division, Washington, DC 20554 and shall contain: follow the Formal Complaints process in part 1, subpart E of this title.

(1) The name and address of the complainant,

(2) The name and address of the defendant against whom the complaint is made,

(3) A complete statement of the facts, including supporting data, where available, showing that such defendant did or omitted to do anything in contravention of this subpart, and

(4) The relief sought.

(D) Amended complaints. An amended complaint setting forth transactions, occurrences or events which have happened since the filing of the original complaint and which relate to the original cause of action may be filed with the Commission.

(E) Number of copies. An original and two copies of all pleadings shall be filed.

(F) Service.

(1) Except where a complaint is referred to a state pursuant to § 64.604(c)(6)(i), or where a complaint is filed directly with a state entity, the Commission will serve on the named party a copy of any complaint or amended complaint filed with it, together with a notice of the filing of the complaint. Such notice shall call upon the defendant to satisfy or answer the complaint in writing within the time specified in said notice of complaint.

(2) All subsequent pleadings and briefs shall be served by the filing party on all other parties to the proceeding in accordance with the requirements of § 1.47 of this chapter. Proof of such service shall also be made in accordance with the requirements of said section.

(G) Answers to complaints and amended complaints. Any party upon whom a copy of a complaint or amended complaint is served under this subpart shall serve an answer within the time specified by the Commission in its notice of complaint. The answer shall advise the parties and the Commission fully and completely of the nature of the defense and shall respond specifically to all material allegations of the complaint. In cases involving allegations of harm, the answer shall indicate what action has been taken or is proposed to be taken to stop the occurrence of such harm. Collateral or immaterial issues shall be avoided in answers and every effort should be made to narrow the issues. Matters alleged as affirmative defenses shall be separately stated and numbered. Any defendant failing to file and serve an answer within the time and in the manner prescribed may be deemed in default.

(H) Replies to answers or amended answers. Within 10 days after service of an answer or an amended answer, a complainant may file and serve a reply which shall be responsive to matters contained in such answer or amended answer and shall not contain new matter. Failure to reply will not be deemed an admission of any allegation contained in such answer or amended answer.

(I) Defective pleadings. Any pleading filed in a complaint proceeding that is not in substantial conformity with the requirements of the applicable rules in this subpart may be dismissed.



(7) ***Treatment of TRS customer information.*** ~~Beginning on July 21, 2000, all future~~ Contracts between the TRS administrator and the TRS vendor shall provide for the transfer of TRS customer profile data from the outgoing TRS vendor to the incoming TRS vendor. Such data must be disclosed in usable form at least 60 days prior to the provider's last day of service provision. Such data may not be used for any purpose other than to connect the TRS user with the called parties desired by that TRS user. Such information shall not be sold, distributed, shared or revealed in any other way by the relay center or its employees, unless compelled to do so by lawful order.

\* \* \* \* \*

(8) ***Incentives for use of IP CTS and VRS Internet-based TRS.***

(i) [Reserved]

\* \* \* \* \*

(v) An VRS Internet-based TRS provider shall not offer or provide to any person or entity any form of direct or indirect incentives, financial or otherwise, for the purpose of encouraging individuals to register for or use the VRS Internet-based TRS provider's service.

(vi) Any ~~IP CTS or VRS Internet-based TRS~~ provider that does not comply with this paragraph (c)(8) shall be ineligible for compensation for such service from the TRS Fund.

\* \* \* \* \*

(10) \* \* \*

(ii) ~~On or after December 8, 2018, any~~ Any volume control or other amplification feature can be adjusted separately and independently of the caption feature.

(11) \* \* \*

(ii) No person shall use IP CTS equipment or software with the captioning on, unless such person is registered to use IP CTS pursuant to 47 CFR 64.611(j).

(iii) IP CTS providers shall ensure that any ~~newly~~ distributed IP CTS equipment has a label on its face in a conspicuous location with the following language in a clearly legible font: "FEDERAL LAW PROHIBITS ANYONE BUT REGISTERED USERS WITH HEARING LOSS FROM USING THIS DEVICE WITH THE CAPTIONS ON." ~~For IP CTS equipment already distributed to consumers by any IP CTS provider as of July 11, 2014, such provider shall, no later than August 11, 2014, distribute to consumers equipment labels with the same language as mandated by this paragraph for newly distributed equipment, along with clear and specific instructions directing the consumer to attach such labels to the face of their IP CTS equipment in a conspicuous location. For software applications on mobile phones, laptops, tablets, computers or other similar devices, IP CTS providers shall ensure that, each time the consumer logs into the application, the notification language required by this paragraph appears in a conspicuous location on the device screen immediately after log-in.~~

(iv) ~~IP CTS providers shall maintain, with each consumer's registration records, records describing any IP CTS equipment provided, directly or indirectly, to such consumer, stating the amount paid for such equipment, and stating whether the label required by paragraph (c)(11)(iii) of this section was affixed to such equipment prior to its provision to the consumer. For consumers to whom IP CTS equipment was provided directly or indirectly prior to the effective date of this paragraph (c)(11), such records shall state whether and when the label required by paragraph (c)(11)(iii) of this section was distributed to such consumer. Such records shall be maintained for a minimum period of five years after the consumer ceases to obtain service from the provider.~~

(v) ~~IP CTS providers shall ensure that their informational materials and websites used to market, advertise, educate, or otherwise inform consumers and professionals about IP CTS include the following language in a prominent location in a clearly legible font: "FEDERAL LAW PROHIBITS ANYONE BUT REGISTERED USERS WITH HEARING LOSS FROM USING INTERNET PROTOCOL (IP)~~

~~CAPTIONED TELEPHONES WITH THE CAPTIONS TURNED ON. IP Captioned Telephone Service may use a live operator. The operator generates captions of what the other party to the call says. These captions are then sent to your phone. There is a cost for each minute of captions generated, paid from a federally administered fund.” For IP CTS provider websites, the language shall be included on the website’s home page, each page that provides consumer information about IP CTS, and each page that provides information on how to order IP CTS or IP CTS equipment. IP CTS providers that do not make any use of live CAs to generate captions may shorten the notice to leave out the second, third, and fourth sentences.~~

\* \* \* \* \*

(d) \* \* \*

(1) \* \* \*

(ii) VRS service must be offered under the name by which the eligible VRS provider offering such service became certified and in a manner that clearly identifies that provider of the service. Where a TRS provider also utilizes sub-brands to identify its VRS, each sub-brand must clearly identify the eligible VRS provider. ~~Providers must route all VRS calls through a single URL address used for each name or sub-brand used.~~

\* \* \* \* \*

(2) [Reserved]

(7) \* \* \*

(i) [Reserved]

\* \* \* \* \*

(iii) \* \* \*

(B) [Reserved]

(C) [Reserved]

\* \* \* \* \*

(vi) [Reserved]

\* \* \* \* \*

3. Amend § 64.606 as follows:

a. revise paragraphs (f)(1), (f)(2), and (g);

**§ 64.606 Internet-based TRS provider and TRS program certification.**

\* \* \* \* \*

(f) \* \* \*

(1) States must notify the Commission of substantive changes in their TRS programs within 60 days of ~~when~~after they occur, and must certify that the state TRS program continues to meet federal minimum standards after implementing the substantive change.

(2) ~~VRS and IP Relay~~Internet-based TRS providers certified under this section must notify the Commission of substantive changes in their TRS programs, services, and features within 60 days of ~~when~~after such changes occur, and must certify that the interstate TRS provider continues to meet Federal minimum standards after implementing the substantive change. Substantive changes shall include, but not be limited to:

\* \* \* \* \*

(g) An Internet-based TRS provider, certified under this section, ~~under this section shall file with the Commission, on an annual basis, a report demonstrating that they are in compliance with § 64.604 must~~ within 60 days of receiving a request from the Commission, submit a report with a detailed description of its current practice and future plans for complying with each rule specified in such request.

~~(1) Such reports must update the information required in paragraph (a)(2) of this section and include updated documentation and a summary of the updates, or certify that there are no changes to the information and documentation submitted with the application for certification, application for renewal of certification, or the most recent annual report, as applicable.~~

~~(2) The chief executive officer (CEO), chief financial officer (CFO), or other senior executive of an Internet-based TRS provider under this section with first hand knowledge of the accuracy and completeness of the information provided, when submitting an annual report under paragraph (g) of this section, must, with each such submission, certify as follows:~~

~~I swear under penalty of perjury that I am \_\_\_\_\_ (name and title), an officer of the above-named reporting entity, and that I have examined the foregoing submissions, and that all information required under the Commission's rules and orders has been provided and all statements of fact, as well as all documentation contained in this submission, are true, accurate, and complete.~~

~~(3) Each VRS provider shall include within its annual report a compliance plan describing the provider's policies, procedures, and practices for complying with the requirements of § 64.604(c)(13) of this subpart. Such compliance plan shall include, at a minimum:~~

~~(i) Identification of any officer(s) or managerial employee(s) responsible for ensuring compliance with § 64.604(c)(13) of this subpart;~~

~~(ii) A description of any compliance training provided to the provider's officers, employees, and contractors;~~

~~(iii) Identification of any telephone numbers, Web site addresses, or other mechanisms available to employees for reporting abuses;~~

~~(iv) A description of any internal audit processes used to ensure the accuracy and completeness of minutes submitted to the TRS Fund administrator; and~~

~~(v) A description of all policies and practices that the provider is following to prevent waste, fraud, and abuse of the TRS Fund. A provider that fails to file a compliance plan shall not be entitled to compensation for the provision of VRS during the period of noncompliance.~~

~~(4) If, at any time, the Commission determines that a VRS provider's compliance plan currently on file is inadequate to prevent waste, fraud, and abuse of the TRS Fund, the Commission shall so notify the provider, shall explain the reasons the plan is inadequate, and shall direct the provider to correct the identified defects and submit an amended compliance plan reflecting such correction within a specified time period not to exceed 60 days. A provider that fails to comply with such directive shall not be entitled to compensation for the provision of VRS during the period of noncompliance. A submitted compliance plan shall not be prima facie evidence of the plan's adequacy; nor shall it be evidence that the provider has fulfilled its obligations under § 64.604(c)(13) of this subpart.~~

~~(5) If a VRS provider is authorized to provide at-home call handling, its annual compliance report shall include the following information:~~

~~(i) The total number of CAs handling VRS calls from home workstations over the preceding year;~~

~~(ii) The number of 911 calls handled by the provider's home workstations;~~

~~(iii) The total number of complaints, if any, submitted to the provider regarding its at-home call handling program or calls handled by at-home CAs; and~~

~~(iv) A description of any substantive changes in the VRS provider's currently effective at-home call-~~

~~handling compliance plan.~~

4. Amend § 64.613 as follows:

a. remove and reserve paragraph (b).

**§ 64.613 Numbering directory for Internet-based TRS users.**

\* \* \* \* \*

(b) [Reserved]

\* \* \* \* \*

5. Amend § 64.615 as follows:

a. revise paragraph (a)(4)(ii)(B).

b. remove and reserve paragraph (b).

(a) \* \* \*

(4) \* \* \*

(ii) \* \* \*

(B) Any user for which a VRS or IP CTS provider makes a request under paragraph (a)(3)(4)(i) of this section

\* \* \* \* \*

(b) [Reserved]

6. Remove and reserve section 64.619

**§ 64.619 [Reserved]**

7. Amend § 64.621 as follows:

a. revise paragraphs (b)(1) and (b)(2);

b. remove and reserve paragraphs (a)(3) and (a)(4).

**§ 64.621 Interoperability and portability.**

(a) \* \* \*

(3) [Reserve]

(4) [Reserve]

(b) \* \* \*

(1) ~~Beginning no later than December 20, 2017,~~ VRS providers shall ensure that their provision of VRS and video communications, including their access technology, meets the requirements of the VRS Provider Interoperability Profile.

(2) ~~Beginning no later than October 24, 2017,~~ VRS providers shall provide a standard xCard export interface to enable users to import their lists of contacts in xCard XML format, in accordance with IETF RFC 6351.

\* \* \* \* \*

8. Amend § 64.623 as follows:

a. revise paragraphs (a) and (b)(4).

**§ 64.623 Administrator requirements.**

(a) For the purposes of this section, the term “Administrator” shall refer to ~~each of the TRS Numbering administrator; and the administrator of the TRS User Registration Database; the administrator of the VRS Access Technology Reference Platform; and the provider of the Neutral Video Communication Service Platform.~~ A single entity may serve in one or more of these capacities.

(b) \* \* \*

~~(4) None of Neither the administrator of the TRS User Registration Database; the administrator of the VRS Access Technology Reference Platform; or the provider of the Neutral Video Communication Service Platform;~~ nor any affiliates thereof; shall be unduly influenced, as determined by the Commission, by parties with a vested interest in the outcome of TRS-related activities.

\* \* \* \* \*

## APPENDIX B INITIAL REGULATORY FLEXIBILITY ANALYSIS

1. As required by the Regulatory Flexibility Act of 1980, as amended (RFA),<sup>1</sup> 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.<sup>2</sup> In addition, the *Notice* and IRFA (or summaries thereof) will be published in the Federal Register.<sup>3</sup>

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

2. In the *Notice*, the Commission proposes specific enhancements for Internet Protocol (IP) Relay and Video Relay Services (VRS), along with administrative reforms to streamline the Telecommunications Relay Services (TRS) program. For IP Relay, the Commission addresses the use of automatic speech recognition (ASR) for speech-to-text conversion and advanced text-to-speech technologies, the need for metrics for IP Relay quality, and compatibility of IP Relay with Real-Time Text (RTT) technology. For VRS, the Commission proposes to require VRS providers to build in captioning functionality and provide VRS providers with increased operational flexibility by loosening restrictions on VRS calls while traveling abroad and adjusting physical call center requirements. Finally, the Commission proposes to streamline TRS provider certification processes and update or eliminate obsolete rules.

### 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.<sup>4</sup> The RFA generally defines the term “small entity” as having the same meaning as the terms “small business,” “small organization,” and “small governmental jurisdiction.”<sup>5</sup> In addition, the term “small business” has the same meaning as the term “small business concern” under the Small Business Act (SBA).<sup>6</sup> A “small business concern” is one which: (1) is independently owned and operated; (2) is not dominant in its field

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<sup>1</sup> 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).

<sup>2</sup> *Id.* § 603(a).

<sup>3</sup> *Id.*

<sup>4</sup> 5 U.S.C. § 603(b)(3).

<sup>5</sup> *Id.* § 601(6).

<sup>6</sup> *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.”

of operation; and (3) satisfies any additional criteria established by the SBA.<sup>7</sup> 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.<sup>8</sup>

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.<sup>9</sup> In general, a small business is an independent business having fewer than 500 employees.<sup>10</sup> These types of small businesses represent 99.9% of all businesses in the United States, which translates to 34.75 million businesses.<sup>11</sup> Next, “small organizations” are not-for-profit enterprises that are independently owned and operated and not dominant their field.<sup>12</sup> 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.<sup>13</sup> Finally, “small governmental jurisdictions” are defined as cities, counties, towns, townships, villages, school districts, or special districts with populations of less than fifty thousand.<sup>14</sup> 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.<sup>15</sup>

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)<sup>16</sup> codes and corresponding SBA size standard.<sup>17</sup> 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 above identified industries.

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<sup>7</sup> 15 U.S.C. § 632.

<sup>8</sup> 13 CFR 121.903.

<sup>9</sup> 5 U.S.C. § 601(3)-(6).

<sup>10</sup> 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](https://advocacy.sba.gov/wp-content/uploads/2024/12/Frequently-Asked-Questions-About-Small-Business_2024-508.pdf).

<sup>11</sup> *Id.*

<sup>12</sup> 5 U.S.C. § 601(4).

<sup>13</sup> 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/>.

<sup>14</sup> 5 U.S.C. § 601(5).

<sup>15</sup> 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.

<sup>16</sup> 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](http://www.census.gov/NAICS) for further details regarding the NAICS codes identified in this chart.

<sup>17</sup> The size standards in this chart are set forth in 13 CFR 121.201, by six digit North American Industrial Classification System (NAICS) code.

Table 1. Census Bureau Data By NAICS Code

Regulated Industry (NAICS Classification)	NAICS Code	SBA Size Standard	Total Firms <sup>18</sup>	Small Firms <sup>19</sup>	% Small Firms in Industry
Wired Telecommunications Carriers <sup>20</sup>	517111	1,500 employees	3,054	2,964	97.05
All Other Telecommunications	517810	\$40 million	1,079	1,039	96.29

Table 2. Telecommunications Service Provider Data

2024 Universal Service Monitoring Report Telecommunications Service Provider Data <sup>21</sup> (Data as of December 2023)	SBA Size Standard (1500 Employees)		
Affected Entity	Total # FCC Form 499A Filers	Small Firms	% Small Entities
Wired Telecommunications Carriers <sup>22</sup>	4,682	4,276	91.33

#### 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.<sup>23</sup>

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 VRS and IP Relay service. Small entities may need to hire professionals such as attorneys, consultants, and engineers to comply with the proposed changes in the *Notice*. The Commission seeks comment on the impact of

<sup>18</sup> See U.S. Census Bureau, *2017 Economic Census of the United States, Employment Size of Firms for the U.S.: 2017*, Table ID: EC1700SIZEEMPFIEM, 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: EC1700SIZEREVFIEM.

<sup>19</sup> *Id.*

<sup>20</sup> Affected Entities in this industry include Competitive Local Exchange Carriers (CLECs), Incumbent Local Exchange Carriers (Incumbent LECs), Interexchange Carriers (IXCs), Local Exchange Carriers (LECs), Other Toll Carriers.

<sup>21</sup> Federal-State Joint Board on Universal Service, Universal Service Monitoring Report at 26, Table 1.12 (2024), <https://docs.fcc.gov/public/attachments/DOC-408848A1.pdf>.

<sup>22</sup> Local Resellers fall into another U.S. Census Bureau industry (Telecommunications Resellers) and therefore data for these providers is not included in this industry.

<sup>23</sup> 5 U.S.C. § 603(b)(4).



requiring RTT technology compatibility for IP Relay providers, and requiring VRS providers to provide built-in ASR captioning. The Commission seeks comment on streamlining existing user registration and verification requirements, which may involve optimal allocations of user registration and verification responsibilities between the provider and the TRS Fund Administrator. The Commission also seeks comment on reducing certification and re-certification requirements for applicants to provide TRS, which would reduce the amount of detail the applicant must provide to demonstrate it will meet all applicable TRS mandatory minimum standards. 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.<sup>24</sup> 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.”<sup>25</sup>

10. The proposed changes to the Commission’s TRS rules are designed to ensure that Internet-based TRS align with twenty-first century technological developments and continue to serve the needs of the disability community. For IP Relay, the Commission seeks comment of the economic impact of ensuring compatibility of IP Relay with RTT technology. The Commission also proposes to revise its rule to facilitate the provision of IP Relay using ASR and text-to-speech technologies. For VRS, the Commission seeks comment on the potential costs incurred by VRS providers to build in captioning functionality. The Commission also would provide VRS providers with increased operational flexibility by loosening restrictions on VRS calls while traveling abroad and adjusting physical call center requirements. The item also seeks to reduce the burden of the certification process on applicants to provide TRS. 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 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 suggest alternatives. The Commission expects to consider alternatives that might minimize the economic impact of any final rules on small entities 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.

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<sup>24</sup> 5 U.S.C. § 603(c).

<sup>25</sup> *Id.* § 603(c)(1)-(4).

**STATEMENT OF  
CHAIRMAN BRENDAN CARR**

Re: *Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities; Structure and Practices of the Video Relay Service Program; Misuse of Internet Protocol Relay Service*, CG Docket Nos. 03-123, 10-51, 12-38, Notice of Proposed Rulemaking (January 29, 2026).

Last year marked the 35th Anniversary of the Americans with Disabilities Act. The FCC plays a critical role in implementing and enforcing the ADA's requirements, including for Telecommunications Relay Services, which allow deaf, hard-of-hearing, or speech impaired individuals to place or receive telephone calls in a functionally equivalent way.

Last fall, we kicked off a proceeding to modernize analog TRS. At the time, I said it was time for the agency to take a first principles approach to accessibility to ensure that the FCC's rules are aligned with modern technology. The technological advancements that necessitated a fresh look at analog TRS also impact IP-based TRS. With today's item, we continue the work we started last year by proposing targeted reforms to Internet-based forms of TRS. This is what I'm calling TRS modernization part two, and this action supports our broader effort to encourage the IP transition. As we make the transition, we are mindful of consumer protection provisions and necessary updates to them like those we propose today.

Principally, we seek comment on changes to improve the provision of IP Relay and Video Relay Service. We also seek comment on streamlining our rules and deleting or updating outdated rules that no longer reflect reality. I look forward to a robust record in this proceeding.

For their great work on this item, I would like to thank Eduard Bartholme, Lisa Wilson Edwards, Michael Scott, William David Wallace, and Joshua Mendelsohn from the Consumer and Governmental Affairs Bureau. I would also like to thank staff from the Office of General Counsel, Office of Economics and Analytics, Office of the Managing Director, Office of Communications Business Opportunities, Wireline Competition Bureau, and Enforcement Bureau for their contributions to this item.

**STATEMENT OF  
COMMISSIONER ANNA M. GOMEZ**

Re: *Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities; Structure and Practices of the Video Relay Service Program; Misuse of Internet Protocol Relay Service*, CG Docket Nos. 03-123, 10-51, 12-38, Notice of Proposed Rulemaking (January 29, 2026).

At the end of last year, the FCC began looking at ways to modernize the Telecommunications Relay Services (TRS). TRS are a type of communications services that allow persons who are deaf, hard of hearing, deafblind, or have speech disabilities to communicate by telephone in a manner that is functionally equivalent to the way persons without such disabilities use telephone service. Over time and with technological advancements, telecommunications relay services have evolved from relying on the analog telephone network to now also being available over the Internet. The proceeding we adopted last November focuses on modernizing analog TRS. Today, we consider a Notice of Proposed Rulemaking (NPRM) to begin a conversation about modernizing Internet-based TRS.

As we undertake the task of assessing the impact of new technologies like Automated Speech Recognition in established Internet-based telecommunications services like IP Relay, IP CTS, and VRS, and as we consider deleting and amending rules that help these services catch up with today's world, we cannot lose sight of our responsibility to prioritize solutions that serve the disability community.

Thank you to the Chairman for incorporating my edits in the NPRM, including asking about how common carriers can share information about TRS with their subscribers in a modern way, and asking about the benefits to retaining the TRS Advisory Council – which has been a forum where consumers, providers, and state policy makers can provide input on the administration of the TRS Fund.

I look forward to hearing from the disability community, industry, state decision-makers involved in the provision of TRS, and the Communications Assistant workforce, on the proposals we make today.

**STATEMENT OF  
COMMISSIONER OLIVIA TRUSTY**

Re: *Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities; Structure and Practices of the Video Relay Service Program; Misuse of Internet Protocol Relay Service*, CG Docket Nos. 03-123, 10-51, and 12-38, Notice of Proposed Rulemaking (January 29, 2026).

In November, the Commission initiated a proceeding to ensure that users of analog forms of Telecommunications Relay Services (TRS) are not left behind as our nation's communications networks transition to IP-based technologies. As I noted at the time, the ultimate goal is to ensure that TRS users can fully benefit from the enhanced capabilities made possible by advanced communications networks.

Today's NPRM continues that work, with a focus on Internet-based forms of TRS. We seek comment on how users and providers can take advantage of innovative technologies and expanded service capabilities, including the potential for automatic speech recognition and other advanced tools to improve IP Relay and Video Relay Service.

This item builds on the FCC's prior actions making ASR capabilities available as an option for providers and users of IP Captioned Telephone Service, another Internet-based TRS offering. Consistent with those efforts, the Commission's objective here is to enhance the consumer experience and ensure that Internet-based TRS continues to evolve alongside other services in the modern communications marketplace.

I thank the Consumer and Governmental Affairs Bureau for its excellent work on this item.