

Recommendations of the Consumer/Disability Telecommunications Advisory Committee

- 1) Strongly recommend that the Commission expands its ongoing outreach efforts. New approaches we encourage the FCC to take are as follows: sponsorship of Town Hall meetings, outreach at community events such as conferences and conventions, mass distribution of multilingual hard copies of materials, on-line distribution through consumer disability-related and industry links, submission of publications targeted to the mass media and consumer organizations and the disability community, Public Service Announcements (if appropriate), and press related opportunities with the Commissioners and through the FCC Web site. Additional efforts should include:
 - a. Make every effort for more active consumer participation in the regulatory process. The FCC has clearly demonstrated a commitment to providing meeting notices and other public documents in a variety of accessible formats. To further meet this commitment, the Commission should work with disability advocacy organizations to insure that the Electronic Comment Filing System (EFCS) is fully accessible to individuals with disabilities and is compliant with Sec. 508 of the Rehabilitation Act of 1973 as Amended. For example, the current practice of posting documents filed with the Commission in the Portable Document Format (PDF) is often inaccessible to users of screen reader technology.
 - b. Educate consumers regarding their rights and responsibilities in the complaint process. Steps in the complaint process should be clearly outlined to the consumer. A consumer should also be informed of his/her options at various stages of the complaint process, and the informal versus formal complaint processes should be clarified.
 - c. Respond publicly to issues that exhibit systemic problems or “pattern and practice” violations of the Act and/or regulations.
 - d. Develop stronger relationships with communities that have specific telecommunications needs or that face unique barriers in accessing telecommunications products and services, (e.g., seniors, limited or non English speaking individuals, and individuals who are blind or visually impaired.) Build on existing relationships with communities that have unfinished regulatory business with the FCC, (e.g. people who are deaf and hard of hearing, Native Americans, etc.)
- 2) Encourage the FCC to recognize and publicize best practices -- in the consumer, business, and disability communities, serving or addressing consumer needs -- and stressing efforts that increase participation and partnership between industry and consumers.

- 3) Encourage the FCC to provide an expanded, more detailed report on a regular basis that highlights common consumer and disability complaints. This expanded report should analyze trends and highlight the nature of model solutions to complaints.
- 4) Commend the FCC's plans to streamline the process to handle informal complaints. We strongly recommend that this streamlining should address the following: (a) timeframes for resolution of complaints, including giving consumers an FCC point of contact and expected timeframe for resolution at the time the consumer files a complaint; (b) appropriate web site links to other governmental agencies who might also be able to assist the consumer with a complaint.
- 5) Encourage the FCC to maximize positive consumer experience with the CAMS network, by considering the following steps:
 - a. Increase training and interaction with the consumer and disability communities.
 - b. Address diversity in hiring, stressing knowledge of and experience with language, culture and disability.
 - c. Support continued use of Mystery Shopper and other strategies to assess service quality.
 - d. Use new and existing communications vehicles (including on-line tools, bulletin boards, newsletters, etc.) to: (1) promote continuing awareness of the telecommunications needs of various constituencies; (2) provide information about proceedings and rulemaking related to those constituencies; and (3) highlight CAMS' "best practices" and complaint resolutions.
 - e. Increase the capability of the FCC to handle complaints from select limited and non-English speaking consumers. Priority should be given to the Spanish, Cantonese, and Mandarin languages.
- 6) FCC should require companies to provide a single point of contact for resolution of complaints involving captioning or video description. FCC should also examine the feasibility and need for a similar single point of contact for resolution of general consumer complaints. The single point of contact information should include a person's name, title, mailing address, email address, and numbers for phone, fax and TTY contact. In addition, the Section 255 point of contact list, currently posted on the FCC's web site, should be expanded and updated at least annually.

- 7) Recommend that current complaint forms be reviewed to ensure that they effectively address specific consumer and disability access issues.
- 8) FCC should provide assistance to consumers in framing complaints and should help identify appropriate solutions for special categories of complaints.

Adopted June 28, 2002