

Consumer Advisory Committee

Recommendation: Questions for Notice of Proposed Rulemaking Regarding Captioned Telephone Relay Service

Hearing Loss Association of America (formerly SHHH) and additional consumer organizations jointly filed a Petition with the FCC asking that captioned telephone service be a mandated TRS service. This Petition also asked that the FCC approve reimbursement for an Internet-based version of captioned telephone service.

The FCC's Consumer Advisory Committee (CAC) has developed the following questions for the FCC to consider for inclusion in a Notice of Proposed Rulemaking (NPRM) in response to the above Petition on captioned telephone relay service. The CAC hopes these questions will encourage the FCC to release an NPRM on captioned telephone service as quickly as possible.

1. What options are available for using captioned telephone service on devices now available on today's market?
2. Where can captioned telephone devices be purchased at retail and at what cost?
3. What sources are available for in-warranty and out-of-warranty service on the equipment? What is the average turn around time? Are loaners available?
4. What is the current and projected monthly/annual production capacity of all manufacturers combined?
5. What variations to the current device(s) are expected in future versions? How will they be made available to potential users?
6. To what extent is captioned telephone service a competitive offering? If it were mandated as a part of TRS, how could states and consumers be assured that all interested TRS providers will have an equal opportunity to competitively offer the service?
7. How many captioned telephone call centers exist nationwide? Where are they located and what is their current call handling capacity? What is projected in terms of growth?
8. What is the average training time for a caption CA? How does this compare with traditional CA?
9. How many agents/resellers currently exist for the service? Are all TRS providers able to offer the caption telephone service?
10. Some states have regulations that require the TRS call center to be located in state it serves. Are their residents able to use captioned telephone?

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11. What are the demographics of the captioned telephone user population, i.e. age, degree of hearing loss, use of amplification, how many are of working age, and what percentage are already TRS users of other modalities? What does captioned telephone service offer those people who have been missing from TRS?
12. What is the projected demand for captioned telephone over the next 5 and 10 years?
13. Which of the current waivers of certain minimum mandatory standards applied to captioned telephone service should be permanently waived? Current waivers include use of voice recognition technology to meet communication assistant (CA) competency skill requirements, use of oral-to-text to replace oral-to-type testing, competency in interpretation of typewritten ASL, and refusal of single or sequential outbound calls. Are there new minimum mandatory standards unique to captioned telephone service that should be incorporated in the TRS Rules?
14. What is the experience of states that include captioned telephone devices in their equipment distribution program? For example, are there restrictions currently in place in terms of eligibility or the number of units being distributed? If so, are there similar restrictions or eligibility requirements for the other equipment available from the state distribution program?
15. What is the experience in terms of cost and demand for states that have open availability of the devices and no restrictions on eligibility or the number of units distributed? In either case, are there waiting lists and what is the average wait time before an eligible recipient is able to obtain a device through the state?
16. What is the experience of states that offer captioned telephone service as part of its TRS? For example, what are the monthly usage rates including average length of call, total number of minutes (interstate, intrastate). What data can states provide showing monthly usage rates since inception of its service?
17. How many states offer captioned telephone service but do not offer the device in its equipment distribution program?
18. Should NECA include the captioned telephone data collected in its Relay Services Data Request when performing its 2006-2007 rate development?
19. What data does NECA have that compares the cost to relay a captioned telephone call with the cost of a traditional TTY relay? Should NECA conduct a cost analysis and comparison with traditional TTY in the same way it did for Internet Relay and TTY (which used to be reimbursed at the same rate until enough difference in costs was found to separate them)?
20. Voice to voice calls are disallowed and not reimbursable by the Interstate TRS Fund. What procedures can be put in place to ensure that calls placed by consumers who do not need captioning are not billed for reimbursement? Are there other instances when captioning is not being used that should also be eliminated from billing to the state or to the Interstate TRS Fund?

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21. Service costs are presently allocated based on the registered user of the device instead of by the originating telephone number as in traditional TTY TRS. If a captioned telephone device is taken to another state which state should pay for service used there?
22. Should the Interstate TRS Fund pay for captioned telephone service minutes when no captioned telephone service is engaged (i.e. session minutes) as is the current practice in some states? Likewise, a captioned telephone service user is able to turn the service on and off several times in the course of a conversation. Should those minutes of non-use be billable to the Interstate TRS Fund?
23. The FCC would like to hear from PSAPs: What has been their experience in handling E911 calls from 1-line and from 2-line captioned telephone users? How do such calls compare with ordinary voice or TTY calls? What are the implications for staff training?
24. The FCC would like to hear of the experience of consumers who needed to dial 9-1-1 for assistance using captioned telephone.
25. Unlike traditional relay, the captioned telephone operator does not announce himself or herself to the voice user of the call. What would be the advantages or disadvantages of such an announcement? What are the potential privacy concerns of the voice user and in what ways might they be mitigated?

Adopted: July 21, 2006