

FCC Consumer Advisory

New Ten-Digit Numbering and Emergency Call Handling Procedures for Internet-Based Telecommunications Relay Services

Beginning on December 31, 2008, persons with hearing and speech disabilities using Video Relay Service (VRS) or Internet Protocol Relay (IP Relay) – two forms of Internet-based Telecommunications Relay Service (TRS) – will be able to obtain ten-digit telephone numbers. This ten-digit number requirement was adopted by the Federal Communications Commission (FCC) in conjunction with 911 call handling requirements for VRS and IP-Relay providers.

TRS calls made through the traditional telephone network automatically pass along to the called party signals that help identify the caller's location. As a result, relay providers will know the caller's location, and can therefore route the call to the appropriate emergency personnel to respond. This routing is not currently possible with the Internet-based forms of TRS, because calls do not pass along location information. The FCC has now adopted rules to address this situation by requiring VRS and IP Relay providers to obtain location information from relay users obtaining ten-digit telephone numbers. The new rules ensure that VRS and IP Relay users are provided 911 service that is comparable to the 911 service provided to traditional telephone users.

What is Internet-Based TRS?

TRS permits persons with a hearing or a speech disability to access the telephone system to call voice telephone users. For example, a TRS user "calls" a relay provider through a text-based device (for example, a text telephone or TTY) and is connected to a communications assistant (CA) who, in turn, makes a voice telephone call to the person the TRS user wishes to call. The CA then speaks to the called party what the relay user has typed, and types back to the calling party what the called party says. In this way, the CA "relays" the call back and forth between the two parties.

With Internet-based TRS, calls are made via the Internet and an IP-enabled device, rather than the telephone network. The two most commonly used forms of Internet-based TRS are VRS and IP Relay. A third type of Internet-based TRS, IP Captioned Telephone Service (IP CTS), is not subject to the new ten-digit numbering and requirements.

VRS – This Internet-based form of TRS allows persons whose primary language is American Sign Language (ASL) to communicate with the CA in ASL using video conferencing equipment and a broadband Internet connection. The CA speaks what is signed to the called party, and signs the called party's response back to the caller. For more information about VRS visit: www.fcc.gov/cgb/consumerfacts/videorelay.html.

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IP Relay – IP Relay allows a person to communicate in text using an IP-enabled device (such as a personal computer) and the Internet, rather than a TTY and the public switched telephone network. For more information about IP Relay visit: www.fcc.gov/cgb/consumerfacts/iprelay.html.

IP CTS – IP CTS allows a person who can speak and who has some residual hearing to simultaneously listen to what is said over the telephone and read captions of what the other person is saying. An Internet connection carries the captions between the relay provider and the user. For more information about IP CTS visit: www.fcc.gov/cgb/consumerfacts/ipcaptioned.html.

Benefits of Ten-Digit Numbers

Beginning December 31, 2008, VRS and IP Relay users will be able to obtain ten-digit telephone numbers by registering with a VRS or IP Relay provider (their “default” provider). With a ten-digit number, VRS and IP Relay users will be able to:

- make an emergency call through their preferred VRS or IP Relay provider and have the call, along with the ten-digit number and location information, automatically route to the appropriate public safety answering point, or “911 call center”, so that emergency personnel they can be dispatched.
- receive calls from voice telephone users calling the ten-digit number assigned to the VRS or IP Relay user. (The caller does not need to know the VRS or IP Relay user’s IP address to make the call.)
- make a call directly to, or receive a call directly from, another person using VRS or IP Relay equipment by dialing a ten-digit number.

VRS or IP Relay users will be able to change default relay providers at any time, but still keep the same telephone number. Providers cannot impose any restrictions or conditions when users request that their number be ported to a new default provider. For more information on local number portability, see the FCC’s consumer fact sheet at www.fcc.gov/cgb/consumerfacts/numbport.html. In addition, consumers can place a call through any provider (such as a provider other than the default provider) by clicking on the URL or address of the other provider. Hearing callers may also place a call with another provider (other than the default provider) by dialing the 800 number of the provider they wish to handle their call.

New Emergency Call Handling Procedures

The FCC’s new rules will require VRS and IP Relay providers to:

- obtain from their users the physical location at which the service will first be used when the users register for ten-digit numbers;
- give users an easy way to update their registered location information if it changes, without cost or additional equipment;

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- route all emergency calls to the appropriate 911 call center and transmit the call-back number and registered location of the caller, the name of the VRS or IP Relay provider, and the identification number of the VRS or IP Relay provider's CA;
- publish a summary of these new procedures, emphasizing the need to keep location information updated, on their Web sites and in any promotional materials addressing emergency call handling; and
- obtain and keep records of affirmative acknowledgement from their registered users that they have received and understood the provider's summary.

Interim Emergency Call Handling Procedures

Until these new procedures take effect on December 31, 2008, the FCC has adopted interim procedures that require all Internet-based TRS providers, including IP CTS providers, at a minimum, to automatically and immediately transfer an emergency call to the appropriate 911 call center or assure that appropriate personnel are notified of the emergency. **Note:** For IP CTS, the interim procedures will continue until outstanding technical and regulatory issues are resolved. IP CTS providers are not required to provide ten-digit numbers or automatically pass location information to emergency personnel.

The interim procedures require Internet-based TRS providers to:

- prioritize incoming emergency calls over non-emergency calls;
- request the caller's name and location at the beginning of the emergency call process for Internet-based TRS callers to update their location information;
- deliver to emergency personnel at the beginning of the outbound link of the call, at a minimum, the name of the Internet-based TRS user and location of the emergency, the name of the provider, the CA's callback and identification numbers; and
- reestablish contact between the caller and the emergency personnel or other authority if either or both legs of the call are disconnected.

Finally, until December 31, 2008, an Internet-based TRS provider must include an advisory on its Web site or in any promotional materials explaining any circumstances in which handling of Internet-based TRS emergency calls may be limited compared to handling of traditional voice service emergency calls.

Emergency Calling Tips for VRS and IP Relay Users

- Make sure you are familiar with your provider's procedures for updating your registered physical location, and promptly update the information if it changes.
- Know any limitations of your service, and have a plan for making emergency calls in the event of a power or Internet outage. You may want to keep a TTY and a

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traditional phone line, or install a backup power supply. Dialing 911 from a TTY or traditional phone remains the most reliable and fastest method of reaching emergency personnel.

- Inform children, babysitters, and visitors about using your TRS service and the limitations, if any, on placing emergency calls.

Filing a Complaint with the FCC

If you have a problem completing a 911 call using an Internet-based TRS provider, notify the provider. You can also file a complaint with the FCC. There is no charge for filing a complaint. The easiest way to file your complaint is to go to the FCC's on-line complaint forms found on the FCC Web site at esupport.fcc.gov/complaints.htm. You will be asked a series of questions that will take you to the correct form and section of the form for providing all of the information the FCC needs to process your complaint. You can also file your complaint with the FCC's Consumer Center by emailing fccinfo@fcc.gov; calling 1-888-CALL-FCC (1-888-225-5322) voice or 1-888-TELL-FCC (1-888-835-5322) TTY; faxing 1-866-418-0232; or writing to:

Federal Communications Commission
Consumer & Governmental Affairs Bureau
Consumer Inquiries and Complaints Division
445 12th Street, SW
Washington, DC 20554.

What to Include in Your Complaint

The best way to provide all the information the FCC needs to process your complaint is to complete fully the on-line complaint form. If you do not use the on-line complaint form, your complaint, at a minimum, should indicate:

- your name, address, email address, and phone number where you can be reached;
- whether you are filing a complaint on behalf of another party, and if so, the party's name, address, email address, day time phone number, and your relationship to the party;
- preferred format or method of response (letter, fax, voice phone call, email, TRS, TTY, ASCII text, audio recording, or Braille);
- that your complaint is about TRS;
- the name, address, and telephone number (if known) of the company or companies involved with your complaint; and
- a brief description of your complaint and the resolution you are seeking, and a full description of the equipment or service you are complaining about, including date of purchase, use, or attempt to use.

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For More Information

For more information about TRS, VRS, IP Relay, or IP CTS, or to learn more about FCC programs to promote access to telecommunications services for people with disabilities, visit the FCC's Disability Rights Office Web site at www.fcc.gov/cgb/dro. For information about other telecommunications issues, visit the FCC's Consumer & Governmental Affairs Bureau Web site at www.fcc.gov/cgb, or contact the FCC's Consumer Center using the information provided for filing a complaint.

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