



# PUBLIC NOTICE

Federal Communications Commission  
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DA 19-959

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## CONSUMER AND GOVERNMENTAL AFFAIRS BUREAU SEEKS COMMENT ON REQUEST BY VTCSECURE, LLC FOR LIMITED WAIVER OF CERTAIN IP CTS MANDATORY MINIMUM STANDARDS WHEN USING AUTOMATIC SPEECH RECOGNITION

CG Docket No. 03-123

Comments Date: October 10, 2019

Reply Comments Date: October 21, 2019

The Consumer and Governmental Affairs Bureau (Bureau) of the Federal Communications Commission (Commission) seeks comment on a request for limited waiver filed by VTCSecure, LLC (VTCSecure), an applicant for certification to provide Internet Protocol Captioned Telephone Services (IP CTS).<sup>1</sup> VTCSecure seeks waiver of certain provisions of the Commission's rules setting mandatory minimum standards applicable to communication assistants (CAs) handling telecommunications relay service (TRS) calls.<sup>2</sup> VTCSecure requests waiver of these rules when IP CTS calls are processed using automatic speech recognition (ASR) technology without the presence of a CA.<sup>3</sup>

*Filing Requirements.* Interested parties may file comments on or before the date indicated on the first page of this document.<sup>4</sup> All filings must reference CG Docket No. 03-123. Comments may be filed using the Commission's Electronic Comment Filing System (ECFS).<sup>5</sup>

- Electronic Filers: Comments may be filed electronically using the Internet by accessing 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.

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<sup>1</sup> VTCSecure, LLC Request for Waiver, CG Docket No. 03-123 (filed Sept. 13, 2019), [https://ecfsapi.fcc.gov/file/109130589901791/IPCTS%20Waiver%20Request\\_VTCSecure.pdf](https://ecfsapi.fcc.gov/file/109130589901791/IPCTS%20Waiver%20Request_VTCSecure.pdf) (VTCSecure Request for Waiver). The Bureau is currently seeking comment on VTCSecure's application for certification to provide IP CTS, with comments due on September 25, 2019, and reply comments due on October 10, 2019. *Comments Sought on Application of VTCSecure, LLC, for Certification to Provide Internet Protocol Captioned Telephone Service*, Public Notice, DA 19-818 (CGB Aug. 26, 2019).

<sup>2</sup> VTCSecure Request for Waiver at 2-3.

<sup>3</sup> VTCSecure Request for Waiver at 1.

<sup>4</sup> See 47 CFR §§ 1.1, 1.45, 1.49.

<sup>5</sup> *Electronic Filing of Documents in Rulemaking Proceedings*, GC Docket No. 97-113, Report and Order, 13 FCC Rcd 11322 (1998).

- Filings can be sent by hand or messenger delivery, by commercial overnight courier, or by first-class or overnight U.S. Postal Service mail. All filings must be addressed to the Commission's Secretary, Office of the Secretary, Federal Communications Commission.
  - All hand-delivered or messenger-delivered paper filings for the Commission's Secretary must be delivered to FCC Headquarters at 445 12th Street, SW, Room TW-A325, Washington, DC 20554. The filing hours are 8:00 a.m. to 7:00 p.m. 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 overnight mail (other than U.S. Postal Service Express Mail and Priority Mail) must be sent to 9050 Junction Drive, Annapolis Junction, MD 20701.
  - U.S. Postal Service first-class, Express, and Priority mail must be addressed to 445 12th Street, SW, Washington DC 20554.

*Ex Parte Rules.* The proceeding this Notice initiates shall be treated as a "permit-but-disclose" proceeding in accordance with the Commission's *ex parte* rules.<sup>6</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 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 rule 1.1206(b). In proceedings governed by rule 1.49(f) 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). Participants in this proceeding should familiarize themselves with the Commission's *ex parte* rules.

*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 Bureau at 202-418-0530 (voice) or 202-418-0432 (TTY).

*Additional Information.* For further information regarding this Notice, please contact Michael Scott, Disability Rights Office, Consumer and Governmental Affairs Bureau, at 202-418-1264 or by e-mail to [Michael.Scott@fcc.gov](mailto:Michael.Scott@fcc.gov).

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<sup>6</sup> 47 CFR §§ 1.1200 *et seq.*