



PUBLIC NOTICE

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CONSUMER & GOVERNMENTAL AFFAIRS BUREAU REMINDS VIDEO RELAY SERVICE (VRS) AND INTERNET PROTOCOL (IP) RELAY SERVICE PROVIDERS OF THEIR OUTREACH OBLIGATIONS AND CLARIFIES THEIR CALL HANDLING OBLIGATIONS FOR UNREGISTERED USERS AFTER THE NOVEMBER 12, 2009, TEN-DIGIT NUMBERING REGISTRATION DEADLINE

**CG Docket No. 03-123
WC Docket No. 05-196**

In 2008, the Commission released two orders adopting a system for assigning Video Relay Service (VRS) and Internet Protocol (IP) Relay users geographically appropriate ten-digit telephone numbers linked to the North American Numbering Plan (NANP).¹ In addition, these orders adopted new emergency call handling (E911) requirements for these services. The rules implementing the new ten-digit numbering and E911 requirements become effective November 13, 2009.² Pursuant to these orders, all VRS and IP Relay providers must, by November 12, 2009, register users, obtain location information, and assign users a ten-digit NANP telephone number.³ Location information is required so that, in the event of an emergency, users can dial 911 via relay and the VRS or IP Relay provider can promptly determine appropriate emergency personnel to contact to respond to the emergency.⁴ After the registration deadline,

¹ See *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 (June 24, 2008) (*Numbering Order & FNPRM*); *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, CC Docket No. 98-67, WC Docket No. 05-196, Second Report and Order and Order on Reconsideration, 24 FCC Rcd 791 (Dec. 19, 2008) (*Second Numbering Order*).

² See *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, Order, 24 FCC Rcd 8000 (June 15, 2009) (extending the registration deadline through November 12, 2009).

³ See, e.g., *Second Numbering Order*, 24 FCC Rcd at 802-03, para. 23.

⁴ *Id.*, 24 FCC Rcd at 802, para. 22 (“registration is necessary for [VRS and IP Relay] providers to associate a[] ... user’s telephone number with his or her IP address to allow for the routing and completion of calls,” and “registration allows [VRS and IP Relay] providers to provide first responders with location information for emergency calls placed over [VRS and IP Relay]”).

providers must obtain registration information from all unregistered users before processing a non-emergency call.

First, we remind VRS and IP Relay providers of their consumer outreach and education obligations, as required in the *Numbering Order & FNPRM*.⁵ For example, providers must include an advisory on their websites and in any promotional material addressing the registration process, numbering portability, and the importance of maintaining up to date registered location information.⁶ We also encourage providers to, among other steps, utilize automatic prompts that appear on the caller's screen when the caller is initiating a call to remind VRS and IP Relays users of the registration deadline and to inform them of the registration process.

Second, we clarify providers' call handling obligations after the November 12, 2009 registration deadline. Beginning on November 13, 2009, VRS and IP Relay providers must register VRS and IP Relay users before they make non-emergency calls.⁷ The provider with which the VRS or IP Relay user registers will serve as the user's default provider, and "all inbound and outbound calls will, by default, be routed through the default provider."⁸ We have made clear to providers, however, that they must inform users that: "(1) 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."⁹ We further clarify that a VRS or IP Relay communications assistant (CA) may, during call set-up (*i.e.*, before the outbound call is made to the called party and a relay call has begun) or call wrap-up (*i.e.*, after the called party has hung up and the relay call has ended) inform the caller of the registration deadline and requirements and assist the caller with the registration process. We also note that, as of November 13, 2009, voice telephone users will no longer be able to reach a VRS or IP Relay user by calling his or her previously obtained "proxy" or "alias" number.¹⁰

Further, beginning on November 13, 2009, VRS and IP Relay providers must verify that the caller is registered before completing a non-emergency call.¹¹ If a caller is not registered, and is making a non-

⁵ *Numbering Order & FNPRM*, 23 FCC Rcd at 11623-24, paras. 90-91.

⁶ *Id.*, 23 FCC Rcd at 11623, para. 90.

⁷ *See Second Numbering Order*, 24 FCC Rcd at 802-03, para. 23. VRS and IP Relay providers must handle all emergency calls regardless of the registration status of the caller. *Id.*, 24 FCC Rcd at 802, para. 22 & n.102, and at 802-03, para. 23.

⁸ *Numbering Order & FNPRM*, 23 FCC Rcd at 11609-10, para. 43.

⁹ *Second Numbering Order*, 24 FCC Rcd at 809-10, para. 38.

¹⁰ *See, e.g., id.*, 24 FCC Rcd at 801-02, para. 21, and at 804-05, para. 27.

¹¹ After a user has registered, verification should happen automatically to calls made via the default provider. For dial-around calls, providers can do a reverse lookup to determine whether the caller is registered (*i.e.*, to determine if the incoming IP address is associated with a ten-digit number in the iTRS database).

emergency call, the provider must first get the caller's necessary registration information¹² but then must complete the call.¹³ We emphasize that the provider must handle calls to or from such callers, to the extent technically feasible, even if the provider has not completed verifying that information, assigning the caller a new ten-digit number, and provisioning that number to the iTRS database.¹⁴

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For further information, please contact Thomas Chandler, Consumer & Governmental Affairs Bureau, Disability Rights Office, at (202) 418-1475 (voice), (202) 418-0597 (TTY), or e-mail at Thomas.Chandler@fcc.gov.

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¹² See *Second Numbering Order*, 24 FCC Rcd at 808-10, paras. 36-38

¹³ As the Commission stated in the *Second Numbering Order*, "to the extent technically feasible, [VRS and IP Relay] providers must allow newly registered users to place calls immediately." *Id.*, 24 FCC Rcd at 803, para. 25.

¹⁴ See *Numbering Order & FNPRM*, 23 FCC Rcd at 11615-16, paras. 60-63; *Second Numbering Order*, 24 FCC Rcd at 808-10, paras. 36-38. To the extent in paragraph 44 of the *Numbering Order & FNPRM* suggests that the provider must provide the caller with a ten-digit number *before* handling any calls for that consumer, we clarify that, as set forth more specifically in the *Second Numbering Order*, VRS and IP Relay providers must allow newly registered users to place calls immediately after they have submitted all of the necessary registration information. See *Numbering Order & FNPRM*, 23 FCC Rcd at 11610, para. 44; *Second Numbering Order*, 24 FCC Rcd at 803, para. 25.