

Before the
Federal Communications Commission
Washington, D.C. 20554

In the Matter of)
)
Misuse of Internet Protocol (IP) Captioned)
Telephone Service) CG Docket No. 13-24
)
Telecommunications Relay Services and Speech-)
to-Speech Services for Individuals with Hearing) CG Docket No. 03-123
and Speech Disabilities)
)

ORDER

Adopted: February 6, 2015

Released: February 6, 2015

By the Acting Chief, Consumer and Governmental Affairs Bureau:

I. INTRODUCTION

1. In this Order, the Consumer and Governmental Affairs Bureau (CGB) of the Federal Communications Commission (FCC or Commission) grants in part a request made by Sorenson Communications, Inc. (Sorenson) and its subsidiary CaptionCall, LLC (CaptionCall) (collectively, Petitioner) to waive the requirement for all providers of Internet Protocol Captioned Telephone Service (IP CTS) to obtain from each new user and each existing user the last four digits of the user’s Social Security number as part of the IP CTS user registration process (“Social Security Number Rule”) in those instances where the user does not have a Social Security number. This waiver of the Social Security Number Rule, granted for a limited period of time, will become effective upon release of this Order and will remain in effect until such time as the Commission takes final action on IP CTS registration procedures pursuant to its open rulemakings on IP CTS matters.

II. BACKGROUND

2. On August 26, 2013, the Commission adopted a report and order to address certain practices related to the provision and marketing of IP CTS¹ that the Commission found were likely to encourage misuse of the service.² The IP CTS Reform Order established prohibitions against financial

¹ Captioned Telephone Service (CTS) is a type of telecommunications relay service (TRS) that permits people who can speak, but who have difficulty hearing over the telephone, to simultaneously listen to the other party and read captions of what that party is saying. Generally, IP CTS uses a connection via the public switched telephone network (PSTN) or voice over Internet Protocol (VoIP) for the voice portion of the call, while the connection carrying the captions between the relay service provider and the relay service user occurs via the Internet. 47 C.F.R. § 64.601(a)(16); Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities, CG Docket No. 03-123, Declaratory Ruling, 22 FCC Rcd 379, 385, ¶ 14 (2007).

² Misuse of Internet Protocol (IP) Captioned Telephone Service; Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities, CG Docket Nos. 13-24 and 03-123, Report and Order and Notice of Proposed Rulemaking, 28 FCC Rcd 13420, 13421-25, ¶¶ 1-10 (2013) (IP CTS Reform Order), vacated in part on other grounds sub nom. Sorenson Communications, Inc. and CaptionCall, LLC v. FCC, (continued...)

incentive programs designed to induce IP CTS use, created registration and certification requirements for IP CTS users, placed limitations on provider distribution of IP CTS equipment and software below a certain cost, and mandated that captions be defaulted to “off” on IP CTS devices.³ Relevant to this petition, the new registration requirement states in part that in order to receive compensation from the TRS Fund for the provision of IP CTS services to new and existing IP CTS users, IP CTS providers must first obtain from each such consumer the last four digits of the consumer’s Social Security number, along with his or her full name, date of birth, address and telephone number.⁴

3. The *IP CTS Reform Order* states that IP CTS providers must collect this registration information, including Social Security digits, from all consumers who enroll after the new registration rules became effective and from all consumers who enrolled before the new registration rules became effective if they were not registered and certified in accordance with the Commission’s interim IP CTS rules.⁵ IP CTS providers have up to 180 days from the effective date of the new registration rules to collect registration information from all such existing IP CTS users who were not previously registered under the interim rules.⁶

4. On July 28, 2014, Petitioner filed a petition requesting a permanent waiver of the Social Security Number Rule for all IP CTS providers, to the extent that this rule applies to new and existing IP

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755 F.3d 702 (D.C. Cir. 2014) (*Sorenson v. FCC*). The Commission took this action to prevent claims to the Interstate TRS Fund for compensation for calls placed by individuals who did not need IP CTS.

³ *IP CTS Reform Order*, 28 FCC Rcd at 13421-22, ¶¶ 2-3. More specifically, in this Order, the Commission (1) prohibited referrals-for-rewards programs and other forms of direct or indirect inducements, financial or otherwise, to register for or use IP CTS or for referral of IP CTS consumers; (2) required each IP CTS provider (i) to register each IP CTS consumer and (ii) as part of the registration process, to obtain from each consumer a self-certification regarding the consumer’s need to use IP CTS, and the consumer’s understanding that the captioning services are provided by a live communications assistant (CA) and that these services are supported by a federal fund; (3) prohibited providers from receiving compensation for minutes of use generated by consumers using IP CTS equipment, software and applications that consumers received for less than \$75 from any source other than a governmental program; and (4) generally required IP CTS providers to ensure that equipment and software used in conjunction with their service have a default setting of captions off at the beginning of each call. *Id.* The United States Court of Appeals for the District of Columbia Circuit vacated the rules relating to payment for equipment and software and setting captions to default off. *Sorenson v. FCC*, 755 F.3d at 710.

⁴ 47 C.F.R. § 64.404(c)(9)(i); *IP CTS Reform Order*, 28 FCC Rcd at 13449, ¶ 64, 13452, ¶ 69.

⁵ See *IP CTS Reform Order*, 28 FCC Rcd at 13449, ¶ 64 (adopting a permanent rule requiring each IP CTS provider to register new users); *id.* at 13452, ¶ 69 (adopting a rule requiring each IP CTS provider “to register . . . all of its existing IP CTS users”); *id.* at 13452, n.216 (defining “existing IP CTS users” as “all users who are enrolled in a provider’s IP CTS as of the effective date of the amended registration and certification rule . . . and who have not previously undergone registration and certification by that provider in compliance with the interim registration and certification rule”). The registration and certification requirements adopted in the *IP CTS Reform Order* became effective on August 28, 2014. See 79 Fed. Reg. 51445 (Aug. 28, 2014); see also *Misuse of Internet Protocol (IP) Captioned Telephone Service; Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities*, CG Docket Nos. 13-24 and 03-123, Order and Notice of Proposed Rulemaking, 28 FCC Rcd 703 (2013) (*IP CTS Interim Order*), vacated *sub nom.* *Sorenson v. FCC*. In other words, IP CTS providers need not register a user in accordance with the final rules if the user was registered and certified in accordance with the interim rules. See *Consumer and Governmental Affairs Bureau Reaffirms Application of Internet Protocol Captioned Telephone Service (IP CTS) Rule on User Registration and Certification*, CG Docket Nos. 13-24 and 03-123, Public Notice, 29 FCC Rcd 9442 (2014) (*IP CTS User Registration and Certification Public Notice*).

⁶ *IP CTS Reform Order*, 28 FCC Rcd at 13452, ¶ 70; 47 C.F.R. § 64.604(c)(9)(xi).

CTS users who do not have a Social Security number.⁷ Petitioner states that although the new registration rule was not yet effective when it filed the instant petition, CaptionCall has sought to collect the required information, including Social Security digits, from all new subscribers and all subscribers who enrolled in and used CaptionCall's IP CTS prior to March 7, 2013.⁸ Petitioner explains, however, that while CaptionCall has been successful in obtaining Social Security digits from most subscribers, it has not been able to collect this information from subscribers who do not have Social Security numbers.⁹

5. Petitioner asserts that there is "good cause" to waive this rule because it prevents consumers who lack Social Security numbers but are otherwise eligible to use IP CTS from registering for IP CTS.¹⁰ At the same time, Petitioner asserts, a waiver presents no risk of harm to the public. Petitioner claims that the Commission has not identified any current use for IP CTS users' Social Security digits, and thus, registering an IP CTS user who cannot provide this data will not increase the TRS Fund's exposure to waste, fraud, and abuse.¹¹ Specifically, Petitioner asserts that there is currently no use for IP CTS users' Social Security numbers because (1) IP CTS does not present the same risk of fraudulent use as other forms of TRS, in that it does not allow anonymous communications, (2) the Commission could obtain an accurate count of the number of IP CTS users by comparing customer names and addresses, and (3) IP CTS users' Social Security numbers are not currently utilized to verify users' identities.¹²

6. Petitioner further asserts that waiver of the Social Security Number Rule would serve the public interest because strict adherence to the rule would "cut off service" to existing consumers who do not have a Social Security number but who have come to depend on IP CTS.¹³ In support of its petition, Petitioner insists that the Social Security Number Rule is contrary to mandates of the Americans with Disabilities Act (ADA) with respect to consumers who do not have Social Security numbers because the ADA requires the Commission to ensure the availability of TRS, including IP CTS, to "all hard-of-hearing consumers" in the United States.¹⁴ Petitioner adds that there is no statutory provision that would allow the Commission to make relay services (including IP CTS) available only to individuals with hearing loss who have Social Security numbers.

7. Additionally, Petitioner asserts that, because neither the Commission nor IP CTS providers presently use Social Security digits for the purpose of verifying the consumer's eligibility to use IP CTS, there is no utility in collecting such data.¹⁵ Accordingly, Petitioner maintains that the Social

⁷ Sorenson Communications, Inc. and CaptionCall, LLC, Petition for Waiver, CG Docket Nos. 13-24 & 03-123 at 1 (filed July 28, 2014) (Petition).

⁸ *Id.* at 3.

⁹ *Id.*

¹⁰ *Id.* at 5-6 (citing 47 C.F.R. § 1.3).

¹¹ *Id.* at 3-4, 6.

¹² *Id.* at 3-4.

¹³ *Id.* at 5.

¹⁴ *Id.* at 1, 3, 5, and 6 (citing the ADA, Pub. L. 101-336, 104 Stat. 327, enacted July 26, 1990, codified at 42 U.S.C. § 12101).

¹⁵ *Id.* at 1. Petitioner suggests that the Commission instead require the collection of alternative information, such as a utility bill, passport number, or state driver's license, if the Commission wants providers to collect identifying information. *Id.* at 6. We note that Petitioner raised similar concerns about the collection of a consumer's Social Security number in its filed Paperwork Reduction Act comments. See Paperwork Reduction Act Comments of Sorenson Communications, Inc., CG Docket Nos. 10-51, 03-123, at 3-6 (filed Jan. 7, 2014). On August 5, 2014, the Office of Management and Budget (OMB) approved, for a period of six months, the information collection (continued...)

Security Number Rule would deprive otherwise eligible existing and potential IP CTS users of “their link to the outside world” simply because they are unable to provide information “that has marginal utility at best.”¹⁶ Finally, Petitioner suggests that any purpose that might exist for requiring Social Security numbers could be met by collecting other information as part of the registration process.¹⁷

8. Consumer Groups and three IP CTS providers each filed a letter either supporting the Petition or requesting that if the Commission grants the waiver, it apply such waiver to all IP CTS providers.¹⁸

III. DISCUSSION

A. Waiver Standard

9. The Commission’s rules may be waived for good cause shown.¹⁹ The Commission may exercise its discretion to waive a rule where the particular facts make strict compliance inconsistent with the public interest.²⁰ In addition, the Commission may take into account considerations of hardship, equity, or more effective implementation of overall policy on an individual basis.²¹ Waiver of the Commission’s rules is therefore appropriate only if special circumstances warrant a deviation from the general rule and such a deviation will serve the public interest.²² Moreover, in demonstrating whether a waiver is warranted, the burden of proof rests with the petitioner.²³ An applicant seeking a waiver faces a high hurdle and must plead with particularity the facts and circumstances that warrant a waiver.²⁴

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requirements associated with registration requirements adopted in the *IP CTS Reform Order*, including the Social Security Number Rule. On August 28, 2014, the registration rules became effective upon publication in the Federal Register of an announcement of OMB’s approval. 79 Fed. Reg. 51445 (Aug. 28, 2014).

¹⁶ Petition at 5.

¹⁷ *Id.* at 3 (asserting that, unlike other forms of relay service, such as Internet Protocol (IP) Relay service, IP CTS does not allow anonymous communications because the IP CTS user must subscribe to a voice telecommunications service).

¹⁸ Telecommunications for the Deaf and Hard of Hearing, Inc., Hearing Loss Association of America, National Association of the Deaf, Deaf and Hard of Hearing Consumer Advocacy Network, Association of Late Deafened Adults, Inc., California Coalition of Agencies Serving Deaf and Hard of Hearing, American Association of the Deaf-Blind, and Cerebral Palsy and Deaf Organization (Consumer Groups), Letter to Marlene H. Dortch, FCC Secretary (Aug. 15, 2014) (supporting the Petition); Purple Communications, Inc., Letter to Marlene H. Dortch, FCC Secretary (Aug. 4, 2014) (requesting that the waiver granted be applied to all IP CTS providers); InnoCaptions, Inc., Letter to Marlene H. Dortch, FCC Secretary (Aug. 11, 2014) (supporting the Petition and requesting that the waiver granted be applied to all IP CTS providers); *Ex Parte* Presentation of Hamilton Relay, Inc., (Aug. 1, 2014) (requesting that any relief granted be applied to all IP CTS providers). Each of these submissions was filed in CG Docket Nos. 03-123 and 13-24.

¹⁹ 47 C.F.R. § 1.3.

²⁰ *Northeast Cellular Telephone Co. v. FCC*, 897 F.2d 1164, 1166 (D.C. Cir. 1990) (*Northeast Cellular*).

²¹ *WAIT Radio v. FCC*, 418 F.2d 1153, 1159 (D.C. Cir. 1969) (*WAIT Radio*); *Northeast Cellular*, 897 F.2d at 1166.

²² *Id.*

²³ *Tucson Radio, Inc. v. FCC*, 452 F.2d 1380, 1382 (D.C. Cir. 1971).

²⁴ *WAIT Radio*, 418 F.2d at 1157 (citing *Rio Grande Family Radio Fellowship, Inc. v. FCC*, 406 F.2d 664 (D.C. Cir. 1968)); *Birach Broadcasting Corp.*, Memorandum Opinion and Order, 18 FCC Rcd 1414, 1415 (2003).

B. Application of Waiver Standard to the Petition

10. We find that Petitioner has shown good cause for the Commission to temporarily waive the Social Security Number Rule as this rule applies to IP CTS users who do not have Social Security numbers. We apply this waiver to all IP CTS providers, including Petitioner.

11. Section 225(b)(1) of the Communications Act of 1934, as amended (the Act), states that in order to fulfill the purposes of section 151 of the Act “to make available to *all individuals in the United States* a rapid, efficient nationwide communication service, and to increase the utility of the telephone system of the Nation,”²⁵ the Commission must make TRS available, to the extent possible and in the most efficient manner, to people with hearing and speech disabilities “in the United States.”²⁶ At the time that it adopted this section, Congress explained that “[g]iven the pervasiveness of the telephone for both commercial and personal matters, the inability to utilize the telephone system fully has enormous impact on an individual’s ability to integrate effectively in today’s society.”²⁷ We find that limiting the use of the telephone to only IP CTS users in the United States with Social Security numbers would be inconsistent with this Congressional intent because it would deny this form of TRS access to a segment of eligible individuals with hearing and speech disabilities who are in the United States. This category of individuals could include, but not be limited to, persons living on tribal lands who may have tribal identification numbers rather than Social Security numbers; foreign students studying in the United States; and residents of other countries who are visiting the United States or who have temporary visas for tourism, medical treatment, or other purposes. Depriving such individuals of access to IP CTS would unfairly place a hardship on these individuals if they are otherwise eligible to use this service and are “in the United States.” We therefore conclude that Petitioner has shown good cause to temporarily waive the Social Security Number Rule for new and existing IP CTS users who do not have Social Security numbers because strict compliance with this rule, as applied to this category of individuals, would be inconsistent with the public interest and the language of section 225(b)(1).²⁸

12. This waiver is granted subject to the condition that IP CTS providers collect alternative documentation or information as described below. Petitioner has not provided sufficient record support for us to accept its contention that the Social Security Number Rule serves no clear purpose²⁹ and the implied corollary, that unconditionally waiving the requirement for IP CTS consumers who lack a Social Security number would not expose the TRS Fund to greater waste, fraud, or abuse.³⁰ More specifically, although we expect the number of new and existing IP CTS users who do not have Social Security numbers to be small, thereby limiting any potential for an increased risk of waste, fraud, or abuse from waiving the requirement for such users, the record does not support the contention that Social Security digits, which have been used to help verify the identity of individuals in the Commission’s Lifeline program, would not have a similar utility here.³¹ Therefore, we adopt Petitioner’s alternative suggestion

²⁵ 47 U.S.C. § 225(b)(1) (emphasis added); *see also id.* § 151.

²⁶ *Id.* § 225(b)(1).

²⁷ S. Rep. No. 116, 101st Cong., 1st Sess. 77 (1989).

²⁸ *See* 47 U.S.C. § 225(b)(1).

²⁹ Petition at 3-4.

³⁰ *See id.* at 6.

³¹ *See Lifeline and Link Up Reform and Modernization, Lifeline and Link Up, Federal-State Joint Board on Universal Service, Advancing Broadband Availability Through Digital Literacy Training, Report and Order and Further Notice of Proposed Rulemaking*, WC Docket Nos. 11-42, 03-109, 12-23, CC Docket No. 96-45, 27 FCC Rcd 6656, 6737-38, ¶ 191 (2012) (*Lifeline and Link Up Reform and Modernization Order*) (requiring eligible (continued...))

that the purpose served by the Social Security Number Rule could be met by having users provide alternative forms of information or documentation as part of the registration process.³² This would also be similar to the Lifeline process, which permits a subscriber living on Tribal lands who does not have a Social Security number to provide an official Tribal Identification number in lieu of the last four digits of a Social Security number³³ and permits a subscriber who cannot be verified through the National Lifeline Accountability Database (NLAD) to provide documentation that verifies the information provided by the subscriber.³⁴

13. Accordingly, we condition the grant of this waiver on a requirement that IP CTS providers obtain certain information or documents that can be used to help verify the identity of individuals who do not have Social Security numbers for the purpose of registering such individuals for IP CTS. For such consumers who live on Tribal lands, providers may fulfill this condition by obtaining an official Tribal identification card number in lieu of the last four digits of a Social Security number prior to registering those individuals for IP CTS. For consumers who do not have a Social Security number or a Tribal identification card number, providers may fulfill this obligation prior to registering such individuals for IP CTS by obtaining – in lieu of the last four digits of a Social Security number – physical or electronic copies of at least one of the following documents confirming the individual’s identity:

- (1) an unexpired driver’s license;
- (2) a birth certificate;
- (3) a current income statement from an employer, paycheck stub, or W-2;
- (4) the prior year’s state, federal or Tribal tax return;
- (5) a Certificate of Naturalization or Certificate of U.S. Citizenship;
- (6) an unexpired Permanent Resident Card or unexpired Permanent Resident Alien Card;
- (7) an unexpired United States government, military, or state issued ID;
- (8) an employer provided work ID or employee ID;
- (9) an unexpired passport;

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telecommunications carriers to submit the date of birth and last four digits of each subscriber’s Social Security number to the National Lifeline Accountability Database (NLAD) because this information is necessary to perform the identification verification check required by the Commission’s rules); *see also id.* at 6742, ¶ 200 (describing the identification verification check, which compares the name, address, date of birth and the last four digits of the Social Security number provided by the subscriber to information in publicly available databases, to determine if all of the information provided by the subscriber is valid). The fact that the Commission’s rules do not expressly require identification verification checks for all IP CTS users, Petition at 4, does not diminish their usefulness in those instances where such checks may be deemed necessary to ensure that service is provided in accordance with the Commission’s rules and section 225.

³² *See* Petition at 6.

³³ *Lifeline and Link-Up Reform and Modernization Order*, 27 FCC Rcd at 6736, n.486. VRS users who live on Tribal lands and lack a Social Security number also may provide an official Tribal identification card number in lieu of the last four digits of a Social Security number to register for VRS, once the TRS-URD is operational. *Structure and Practices of the Video Relay Service Program; Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities*, CG Docket Nos. 10-51 and 03-123, Report and Order and Further Notice of Proposed Rulemaking 28 FCC Rcd 8618, 8650, n.170 (2013) (*VRS Structural Reform Order*).

³⁴ *See Lifeline and Link-Up Reform and Modernization Order*, 27 FCC Rcd at 6743, ¶ 201 (requiring the Universal Service Administrative Company to establish a process to allow consumers who fail the identification verification through the NLAD to provide additional information to verify their identity); *see also* USAC.org, NLAD Dispute Resolution – Lifeline Program, <<http://usac.org/li/tools/nlad/nlad-dispute-resolution.aspx>> (last visited Jan. 7, 2015).

- (10) an unexpired health insurance card;
- (11) military discharge documentation;
- (12) government assistance program documents which include the individual's name and date of birth; and
- (13) an unemployment/workers' compensation statement of benefits.³⁵

14. In addition, for those IP CTS consumers who cannot provide either the last four digits of a Social Security Number or a Tribal identification number, we require, as a condition of the waiver, that each provider ensure that such users are located in the United States.³⁶ Where the form of IP CTS to be provided requires the consumer³⁷ to subscribe to either public switched telephone network (PSTN) or interconnected voice over the Internet (VoIP) service³⁸ in the United States for the voice component of IP CTS, the service configuration itself is enough to establish the user as located in the United States. This would apply, for example, where the consumer connects a phone with IP CTS capability to the consumer's landline or interconnected VoIP service, as well as to wireless and web applications that require the consumer to utilize the consumer's PSTN or interconnected VoIP service for the voice component of IP CTS. For IP CTS wireless and web applications that do not require a PSTN or interconnected VoIP service in the United States for the voice component of IP CTS, to ensure that the users are in the United States, and as a condition of the waiver, providers must obtain documentation to verify the address of the user prior to registering the user for IP CTS.³⁹ Providers may fulfill this condition for such web and wireless IP CTS users by obtaining physical or electronic copies of one of the following forms of documentation that verifies the address of such consumers:⁴⁰

- (1) an unexpired driver's license;
- (2) a utility bill;
- (3) a current income statement from an employer, paycheck stub, or W-2;
- (4) the prior year's state, federal or Tribal tax return;
- (5) a current mortgage or lease statement;⁴¹
- (6) an unexpired United States government or state issued ID;
- (7) government assistance program documents which include the name and address of the individual;
- (8) a retirement/pension statement of benefits; and

³⁵ All of these documents are accepted to verify *the identity* of Lifeline subscribers who otherwise cannot be verified by the National Lifeline Accountability Database (NLAD). See USAC.org, NLAD Dispute Resolution – Lifeline Program, <<http://usac.org/li/tools/nlad/nlad-dispute-resolution.aspx>> (last visited Jan. 7, 2015). We conclude that, based on their use in the Lifeline program, these documents will assist in the verification of IP CTS users who cannot provide the last four digits of a Social Security number.

³⁶ See 47 U.S.C. § 225(b)(1) (requiring the Commission ensure that TRS is available to individuals “in the United States” who are deaf, hard of hearing, deaf-blind or have speech disabilities).

³⁷ Another party, such as an employer, relative, or housemate, can act on behalf of the consumer.

³⁸ See 47 C.F.R. § 9.3 (defining interconnected VoIP service).

³⁹ For IP CTS wireless applications that utilize an over-the-top VoIP connection for the voice component of IP CTS, if the provider can ensure that the IP CTS wireless application is downloaded only to mobile phones associated with wireless service in the United States, we will not require the provider to obtain documentation to verify the address of the user.

⁴⁰ To clarify, such documentation is in addition to the documentation required above to verify the user's identity. Where a document is included in both lists, however, the same document may be used for both purposes.

⁴¹ This may include an agreement to reside in a school dormitory.

(9) an unemployment/workers' compensation statement of benefits.⁴²

15. We decline to make the waiver granted by this order permanent. The Commission has open rulemaking proceedings on the registration requirements for IP CTS⁴³ and has sought specific comment on performing "identity verification check[s]" of IP CTS users using the TRS-URD.⁴⁴ These rulemakings will allow the Commission to determine the extent to which IP CTS users' Social Security numbers will be required in the future, including the extent to which they will be used by the TRS-URD to verify such users. Accordingly, we grant a temporary waiver only until such time as the Commission takes final action on IP CTS user registration and verification procedures pursuant to its open rulemaking proceedings on such matters.

16. In summary, we find that Petitioner has shown good cause to temporarily waive the Social Security Number Rule as it applies to IP CTS users who do not have Social Security numbers, because not granting the requested waiver could likely result in the denial of IP CTS to several classes of individuals who are otherwise eligible for IP CTS, and because we conclude that alternative documentation can be used to reduce the risk to the Fund of fraud, waste and abuse to the IP CTS program. We grant a temporary waiver of this requirement for IP CTS users who do not have such numbers until such time that the Commission takes final action on IP CTS user registration and verification procedures pursuant to its open rulemakings on IP CTS matters. We condition such waiver on a requirement for providers to obtain certain information or documentation to verify the identity, and in the case of certain web and wireless users, the address, of the user in lieu of the last four digits of a Social Security number, as specified above.⁴⁵

IV. ORDERING CLAUSES

17. Accordingly, IT IS ORDERED that, pursuant to the authority contained in sections 4(i) and 4(j) and 225 of the Communications Act of 1934, as amended, 47 U.S.C. §§ 154(i), 154(j) and 225, and sections 0.141, 0.361 and 1.3 of the Commission's rules, 47 C.F.R. §§ 0.141, 0.361 and 1.3, this Order IS ADOPTED.

18. IT IS FURTHER ORDERED that the Petition for Waiver filed by Sorenson Communications, Inc. and CaptionCall, LLC on July 28, 2014, IS GRANTED to the extent specified herein and IS OTHERWISE DENIED.

⁴² All of these documents are accepted to verify *the address* of Lifeline subscribers whose addresses otherwise cannot be verified by the NLAD. See USAC.org, NLAD Dispute Resolution – Lifeline Program, <<http://usac.org/li/tools/nlad/nlad-dispute-resolution.aspx>> (last visited Jan. 7, 2015). We conclude that, based on their use in the Lifeline program, these documents will assist in the verification of IP CTS users who do not provide the last four digits of their Social Security numbers.

⁴³ See *IP CTS Reform Order*, 28 FCC Rcd at 13479-80, ¶¶ 128-30 (seeking comment on whether the "centralized registration and verification processes" adopted for VRS should also apply to CTS, and specifically, whether the Commission should include IP CTS user registration data and verification in the TRS User Registration Database (TRS-URD)); see also *VRS Structural Reform Order*, 28 FCC Rcd at 8714-15, ¶¶ 251-52 (2013) (seeking comment on integrating all forms of iTRS, including IP CTS, into the TRS-URD).

⁴⁴ *IP CTS Reform Order*, 28 FCC Rcd at 13480, ¶ 130.

⁴⁵ See ¶¶ 13-14, *supra*.

19. IT IS FURTHER ORDERED that this Order SHALL BE EFFECTIVE upon release.

FEDERAL COMMUNICATIONS COMMISSION

Kris Anne Monteith
Acting Chief
Consumer and Governmental Affairs Bureau