

PUBLIC NOTICE

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VIDEO RELAY SERVICE PROVIDERS MAY BEGIN SUBMITTING DATA TO THE TRS USER REGISTRATION DATABASE

CG Docket Nos. 10-51 and 03-123

This constitutes notice to video relay service (VRS) providers that the Telecommunications Relay Service User Registration Database (TRS-URD) is ready to accept registration information for registered VRS users.¹ By February 28, 2018, each VRS provider must submit to the TRS-URD registration information and user self-certifications of eligibility for all users registered for VRS as of that date.² Thereafter, registration data and self-certifications for newly registered users must be submitted to the TRS-URD upon initiation of service.³

The TRS-URD, a centralized system of records containing TRS user registration data, has been established pursuant to the *2013 VRS Reform Order* to ensure accurate registration and verification of TRS users, achieve more effective prevention of waste, fraud, and abuse, and determine the number of individuals using VRS.⁴ Federal Communications Commission (Commission or FCC) rules require each VRS provider to submit to the TRS-URD registration information for, and a user self-certification of eligibility from, each of its registered users.⁵ User identities are then verified and each registered user is assigned a unique identifier.⁶

Specifically, each VRS provider must submit, in accordance with the directions of the TRS-URD administrator, the following information for each VRS user for whom it serves as the default provider:⁷

- Full name, full residential address, ten-digit telephone number assigned in the TRS Numbering Directory, last four digits of the Social Security number or Tribal

¹ See generally *Structure and Practices of the Video Relay Service Program; Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities*, Report and Order and Further Notice of Proposed Rulemaking, 28 FCC Rcd 8618, 8647-56, paras. 62-86 (*2013 VRS Reform Order*).

² *Id.* at 8651, 8654, paras. 71, 82 (requiring that providers submit this information to the TRS-URD within 60 days of public notice from the Commission that this database is ready to accept such information); 47 CFR § 64.611(a)(3)(v), (4)(ii).

³ *2013 VRS Reform Order*, 28 FCC Rcd at 8651, 8654, paras. 71, 82; 47 CFR § 64.611(a)(4)(iii). Self-certifications need not be filed for users transferring to a new default provider if a query to the TRS-URD shows a self-certification was filed by the previous default VRS provider. 47 CFR § 64.611(a)(3)(vi).

⁴ 47 CFR § 64.601(a)(40); see also *2013 VRS Reform Order*, 28 FCC Rcd at 8624, para. 8.

⁵ 47 CFR § 64.611(a)(3)(v), (4)(ii)-(iii); see also *2013 VRS Reform Order*, 28 FCC Rcd at 8650-51, 8654, paras. 70, 82.

⁶ 47 CFR § 64.615(a); see also *2013 VRS Reform Order*, 28 FCC Rcd at 8651-52, 8655-56, paras. 73, 84-86.

⁷ 47 CFR § 64.611(a)(4)(iii); see also *2013 VRS Reform Order*, 28 FCC Rcd at 8651, 8654, paras. 71, 82.

identification number,⁸ and date of birth;

- The user's registered location information for emergency calling purposes;
- VRS provider name and dates of service initiation and termination;
- A digital copy of the user's written self-certification of eligibility for VRS and the date it was obtained by the provider;⁹
- The date on which the user's identification was verified; and
- For existing users only, the date on which the user last placed a point-to-point or relay call.¹⁰

We remind providers that before submitting a VRS user's information to the TRS-URD, the provider must obtain consent from the user.¹¹ To obtain consent, the VRS provider must describe to the user in writing, using clear and easily understandable language, the specific information being submitted, that the information is being provided to the TRS-URD to ensure the proper administration of the TRS program, and that failure to provide consent will result in the user being denied service. VRS providers must obtain and keep a record of such consent from every registered user.¹²

After registration information has been submitted to the TRS-URD, an identity verification check will be conducted by the TRS-URD administrator, Rolka Loube. Beginning March 1, 2018, VRS providers may not register a new user, or seek compensation for calls placed by any registered user, who does not pass this identification verification check.¹³

The Commission's rules also provide that information entered in the TRS-URD will be used to validate the eligibility of the video party to each VRS call in response to queries by VRS providers.¹⁴ Because this function of the TRS-URD is not yet activated, VRS providers are not required to transmit per-call validation queries at this time. In addition, currently the TRS-URD is not ready to accept registration information for hearing point-to-point video users.¹⁵ Finally, the notice provided herein does not require registration of public and enterprise videophones or users of such devices, as this matter is

⁸ For users who do not have a Social Security number or a Tribal identification number, a VRS provider may submit alternative documentation in accordance with *Structure and Practices of the Video Relay Service Program; Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities*, Order, 30 FCC Rcd 4806 (CGB 2015).

⁹ The self-certification must attest that the individual has a hearing or speech disability that makes them eligible to use VRS and that such person understands that the cost of VRS calls is paid for by contributions from other telecommunications users to the TRS Fund. 47 CFR § 64.611(a)(3); *2013 VRS Reform Order*, 28 FCC Rcd at 8654-55, para. 83.

¹⁰ 47 CFR § 64.611(a)(4); *see also 2013 VRS Reform Order*, 28 FCC Rcd at 8650-51, para. 70.

¹¹ 47 CFR § 64.611(a)(4)(i); *see also 2013 VRS Reform Order*, 28 FCC Rcd at 8650-51, para. 70.

¹² *Id.*

¹³ 47 CFR § 64.615(a)(5).

¹⁴ 47 CFR § 64.615(a)(1); *see also 2013 VRS Reform Order*, 28 FCC Rcd at 8651, para. 72.

¹⁵ *See* 47 CFR § 64.611(a)(5)(v); *Structure and Practices of the Video Relay Service Program; Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities*, Report and Order, Further Notice of Proposed Rulemaking, Notice of Inquiry, and Order, 32 FCC Rcd 2436, 2455, para. 44 (2017) (*VRS Improvements Order*) (permitting hearing users of American Sign Language to obtain ten-digit telephone numbers usable for making point-to-point video calls over VRS networks).

being addressed in a separate proceeding.¹⁶ At a subsequent time, the Commission's Managing Director will release public notices addressing timelines for these remaining matters.

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 or call the Consumer and Governmental Affairs Bureau at 202-418-0530 (voice), 844-432-2275 (videophone), or 202-418-0432 (TTY).

For further information, please contact Andrew Mulitz, Office of the Managing Director, at Andrew.Mulitz@fcc.gov or 202-418-0827 or Michael Scott, Disability Rights Office, Consumer and Governmental Affairs Bureau, at Michael.Scott@fcc.gov or 202-418-1264. Those using videophones and fluent in American Sign Language may call the FCC's ASL Consumer Support Line at 844-432-2275 (videophone).

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¹⁶ See *VRS Improvements Order*, 32 FCC Rcd at 2481-84, paras. 116-124.