Federal Communications Commission 45 L Street NE Washington, DC 20554

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DA 22-1087

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COMMENT SOUGHT ON APPLICATION OF MEZMO CORPORATION DBA INNOCAPTION FOR FULL CERTIFICATION AS A PROVIDER OF INTERNET PROTOCOL CAPTIONED TELEPHONE SERVICE

CG Docket Nos. 03-123 and 13-24

Comments Due: October 26, 2022

Reply Comments Due: November 7, 2022

The Consumer and Governmental Affairs Bureau (CGB or Bureau) of the Federal Communications Commission (FCC or Commission) seeks comment on the application of Mezmo Corporation (dba InnoCaption) (InnoCaption) for full certification as a provider of Internet Protocol Captioned Telephone Service (IP CTS).¹

InnoCaption has redacted portions of its application for which it requests confidential treatment. Access to the redacted material is governed by the Third Protective Order in this docket.²

Filing Requirements. Interested parties may file comments on InnoCaption's application on or before the dates indicated on the first page of this document.³ All filings must reference CG Docket Nos. 03-123 and 13-24. Comments may be filed using the Commission's Electronic Comment Filing System (ECFS).⁴

¹ See Internet-Based TRS Certification Application of Mezmo Corporation for Full Certification to Provide Internet Protocol Captioned Telephone Service, CG Docket Nos. 03-123 and 10-51 (filed Sept. 12, 2022) (InnoCaption Application), https://www.fcc.gov/ecfs/document/10912237476222/1 (redacted). InnoCaption has been granted conditional certification to provide IP CTS using communication assistants. See Notice of Conditional Grant of Application of Miracom USA, Inc., for Certification as a Provider of Internet Protocol Captioned Telephone Service Eligible for Compensation from the Telecommunications Relay Services Fund, CG Docket Nos. 03-123, 10-51, and 13-24, Public Notice, 29 FCC Rcd 5105, 5107 (CGB 2014); see also Structure and Practices of the Video Relay Service Program, CG Docket No. 10-51, Second Report and Order and Order, 26 FCC Rcd 10898, 10914-15, para. 37 (2011) (authorizing conditional certification of Internet-based TRS providers). InnoCaption also has been granted conditional certification to provide fully automatic (ASR only) IP CTS. See Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities, Memorandum Opinion and Order, 35 FCC Rcd 14193, 14202-03, paras. 21, 25 (2020). That conditional certification expires December 11, 2022.

² See Misuse of Internet Protocol (IP) Captioned Telephone Service; 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. 13-24, 10-51, and 03-123, Order and Third Protective Order, 33 FCC Rcd 6802, 6803, para. 4 (CGB 2018).

³ See 47 CFR §§ 1.1, 1.45, 1.49.

⁴ Electronic Filing of Documents in Rulemaking Proceedings, GC Docket No. 97-113, Report and Order, 13 FCC Rcd 11322 (1998).

- Electronic Filers: Comments may be filed electronically using the Internet by accessing the ECFS: https://www.fcc.gov/ecfs/filings.
- Paper Filers:
 - Parties who choose to file by paper must file an original and one copy of each filing. If
 more than one docket or rulemaking number appears in the caption of this proceeding,
 filers must submit two additional copies for each additional docket or rulemaking
 number
 - 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.
 - Currently, the Commission does not accept any hand delivered or messenger delivered filings as a temporary measure taken to help protect the health and safety of individuals, and to mitigate the transmission of COVID-19. In the event that the Commission announces the lifting of COVID-19 restrictions, a filing window will be opened at the Commission's office located at 9050 Junction Drive, Annapolis Junction, Maryland 20701.⁵
 - O 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 may be addressed to 45 L Street, NE, Washington, DC 20554.
 - During the time the Commission's building is closed to the general public and until further notice, if more than one docket or rulemaking number appears in the caption of a proceeding, paper filers need not submit two additional copies for each additional docket or rulemaking number; an original and one copy are sufficient.

Ex Parte Requirements. The proceeding this Notice initiates shall be treated as a "permit-butdisclose" proceeding in accordance with the Commission's ex parte rules.⁶ 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.

Accessible Materials. To request materials in accessible formats for people with disabilities

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⁵ See FCC Announces Closure of FCC Headquarters Open Window and Change in Hand-Delivery Policy, Public Notice, 35 FCC Rcd 2788 (OMD 2020).

⁶ 47 CFR §§ 1.1200 et seg.

(Braille, large print, electronic files, audio format), send an e-mail to <u>fcc504@fcc.gov</u> or call the Consumer and Governmental Affairs Bureau at (202) 418-0530.

For further information, please contact Joshua Mendelsohn at (202) 599-7304 or by e-mail at <u>Joshua.Mendelsohn@fcc.gov</u>, or Ike Ofobike at (202) 744-3916 or by e-mail at <u>Ike.Ofobike@fcc.gov</u>. Individuals who use videophones and are fluent in American Sign Language (ASL) may call the FCC's ASL Consumer Support Line at (844) 432 □ 2275.