



PUBLIC NOTICE

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DIRECT VIDEO CALLING CAN ENHANCE ACCESSIBILITY OF CONSUMER CALL CENTERS

CG Docket Nos. 03-123 and 10-51

This Public Notice highlights how government agencies, businesses, and others can use Direct Video Calling (DVC) to enhance access to customer service and other consumer-facing call centers for people with disabilities.

American Sign Language (ASL) is the third most commonly used language in the United States.¹ For sign language users, making direct telephone contact with the federal government can be especially frustrating. DVC, an Internet-based communication service, enables direct video conversations between two or more callers using ASL.² With DVC, sign language users can place video calls to consumer support lines and communicate directly with support staff who are fluent in ASL. The Federal Communications Commission (FCC or Commission) encourages public and private sector entities to offer DVC as an option for ASL users to communicate with call centers to ask questions, obtain information, and conduct relevant business. This approach has been successfully used by numerous public and private sector organizations. On July 30, 2024, the Commission conducted a Public Forum on DVC access to federal government programs and services, which highlighted the availability of DVC on consumer support lines operated by the FCC, the U.S. Department of Health and Human Services (HHS), and the U.S. Equal Employment Opportunity Commission (EEOC).³

DVC allows sign language users to engage in direct, rather than interpreted communication (including unfiltered communication of visual cues, which are particularly important to persons with hearing and speech disabilities), where each call participant has native fluency in ASL.⁴ The availability

¹ *Amendment to Part 11 of the Commission's Rules Regarding the Emergency Alert System*, PS Docket No. 15-94, FCC 24-23, Notice of Proposed Rulemaking, 39 FCC Rcd 1949, 1961, para. 25 & n.67 (2024) (noting that more than half a million people in the United States use ASL as their native language).

² *See Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities; Structure and Practices of the Video Relay Service Program*, CG Docket Nos. 03-123 and 10-51, Order and Declaratory Ruling, 32 FCC Rcd 775, 775, para. 1 n.1 (WTB CGB 2017) (*VTCSecure Waiver Order*).

³ The forum included a review of Executive Orders mandating accessibility of federal programs and services, an overview of the regulatory framework for DVC, a demonstration of direct video calls to the FCC's ASL Consumer Support Line, and two panel discussions—one on the benefits of implementing DVC and a second on how to implement DVC in call centers. The archived webcast and related materials are available at: www.fcc.gov/dvc.

⁴ *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, CC Docket No. 98-67, and WC Docket No. 05-196, Second Report and Order and Order on Reconsideration, 24 FCC Rcd 791, 821-22, para. 67 (2008) (*Second TRS Numbering Order*).

of DVC in customer support call centers provides ASL users direct, visual, and reciprocal communication with both public and private sector entities.⁵

DVC as an Alternative to TTYs. Many years ago, the only way a person who is deaf or hard of hearing could make a phone call was via text telephony (TTY), an analog communication protocol developed in the mid-20th century, long before the advent of cellphones and IP-based communication.⁶ To allow direct communication with deaf or hard of hearing consumers, many business organizations and government agencies obtained TTY telephone numbers, which even today are posted next to voice customer service numbers as a suggested means for direct communication. However, direct TTY calls require users to take turns typing text and following specific call etiquette rules during the conversation, which can significantly lengthen calls. In addition, TTYs were designed for use on the copper switched network, and are often unreliable on IP-based networks. With the prevalence of IP-based technology today, the use of TTYs by the deaf and hard of hearing community has declined greatly, and TTY technology is considered antiquated and obsolete.⁷ Yet, many public and private entities continue to rely on TTY as their only method of direct telephone communication with those consumers who need an alternative to voice.

DVC, in which video calls to customer service lines are answered by individuals whose first language is ASL, offers an up-to-date alternative to TTY lines for persons who use ASL. Because ASL has its own vocabulary and grammatical structure, a DVC call allows ASL users to speak more naturally in their native language, rather than requiring them to use English vocabulary and grammar in a text-based conversation on TTY.

DVC as an Alternative to Relay Service. With the transition to Internet Protocol (IP)-based networks, TRS has been modernized to include Internet-based methods of communication for individuals with hearing and speech disabilities. In fact, ASL users are more likely to contact a customer support center through Video Relay Service (VRS) than via TTY.⁸ With VRS, persons with hearing and speech disabilities who use ASL can use video devices to make telephone calls. A video link allows the ASL user to view, and sign with, a CA, who has a voice telephone connection to the other party to the call. The CA interprets and relays the conversation back and forth between the two parties.

⁵ See *VTCSecure Waiver Order*, 32 FCC Rcd at 779, para. 9.

⁶ A consumer could use a TTY device to place a call either directly (to another TTY user) or via a TTY-based relay service. With text-based TTY relay service, the TTY user places a call to a relay center, where a communications assistant (CA) receives the text on a TTY device, places a voice telephone call to the hearing party, and relays the conversation back and forth, voicing the TTY user's text communication to the hearing party and typing the hearing party's voiced communication to the TTY user.

⁷ Usage of TTY devices—which operate only on the copper-based Public Switched Telephone Network (PSTN) -- has significantly dropped, and real-time text (RTT) technology is available as a successor to TTYs on wireless IP-based networks. See 47 CFR Part 67; www.fcc.gov/rtt; *Transition from TTY to Real-Time Text Technology*, CG Docket No. 16-145 and GN Docket No. 15-178, Notice of Proposed Rulemaking, 31 FCC Rcd 6247, 6354-56, paras. 11-12 (2016) (describing limitations and declining use of TTYs).

⁸ The decline in TTY usage and heavy reliance on VRS is evidenced in annual reports from the TRS Fund administrator. Ten years ago, for Fund Year 2013-2014, the administrator projected demand for interstate TTY Relay minutes at just over 3 million, and for VRS, 123.3 million minutes. Rolka Loube Salzer Associates LLC, *Interstate Telecommunications Relay Services Fund: Payment Formulas and Fund Size Estimate*, CG Docket Nos. 03-123 and 10-51, Ex. 2 (May 1, 2013). For Fund Year 2023-2024, the administrator projected just over 727,000 interstate TTY minutes, and 117.5 million VRS minutes. Rolka Loube Associates LLC, *Interstate Telecommunications Relay Services Fund: Payment Formulas and Fund Size Estimate Supplemental Comment*, CG Docket Nos. 03-123 and 10-51, Ex. 2 (June 26, 2023). While statistics on overall use of TTY for direct calling are not available, anecdotal evidence suggests that such use is also rare today.

DVC offers an important alternative to VRS, enabling point-to-point conversations to occur between two callers, both using sign language, without the need for assistance by a third-party relay service. Accordingly, public and private entities that currently receive a substantial volume of VRS calls may consider adding a DVC line.

When implemented, DVC can become the preferred means of communication for ASL users. DVC is currently available on a number of public and private sector consumer support lines, including Comcast's help line, the Commission's ASL Consumer Support Line, the EEOC's ASL Contact Line,⁹ HHS's Disability Information and Access Line,¹⁰ and the 988 Suicide & Crisis Lifeline.¹¹ In presentations at the FCC's Public Forum, Comcast reported that it gradually expanded its help lines with DVC since 2019 and now serves 2,000 to 3,000 DVC callers each month. Another presenter stated that, in the first 10 months after DVC became available, the 988 Suicide and Crisis Lifeline served about 30,000 DVC callers. These examples demonstrate the practicability and benefits of offering DVC as an alternative means of accessing public-sector consumer support.

Expanded use of the DVC alternative could greatly increase its benefits, as sign language users make thousands of calls weekly to federal government support lines. For example, according to data maintained by the TRS Fund administrator, over a recent 12-month period:

- The Social Security Administration's consumer support line (800-772-1213) handled 153,971 VRS calls, totaling 4,842,479 minutes;
- The Direct Express consumer support line (888-741-1115), offered by the U.S. Department of the Treasury, handled 137,326 VRS calls, totaling 453,278 minutes;
- The United States Postal Service consumer support line (800-275-8777) handled 29,122 VRS calls, totaling 450,191 minutes;
- The Medicare hotline (800-MEDICARE) received 21,550 VRS calls, totaling 377,707 minutes; and
- The Internal Revenue Service hotline (880-829-1040) received 19,882 VRS calls, totaling 241,620 minutes.

Adopting DVC could substantially reduce the average duration of these consumer support calls—and increase consumer satisfaction in dealing with federal agencies.¹²

By making DVC available on its consumer help lines, a federal agency can bring to thousands of consumers the benefits of direct engagement. Implementing DVC can help ensure that the federal agencies are “accountable for designing and delivering services with a focus on the actual experience of the people whom it is meant to serve,” and deliver their services “more equitably and effectively, especially for those who have been historically underserved.”¹³

⁹ See EEOC, “EEOC Launches Direct Video Access to ASL Speakers for the Deaf and Hard of Hearing,” Press Release (Dec. 11, 2015).

¹⁰ See Administration for Community Living (ACL), “HHS Launches Hotline to Improve Access to COVID-19 Vaccines for People with Disabilities,” Press Announcement (June 8, 2021).

¹¹ Substance Abuse and Mental Health Services Administration (SAMHSA), “988 Suicide & Crisis Lifeline Adds American Sign Language Services for Deaf and Hard of Hearing Callers,” Press Announcement (Sept. 8, 2023).

¹² A federal agency or enterprise organization can obtain information on the volume of VRS calls to their consumer service lines by contacting the FCC's Disability Rights Office at DRO@fcc.gov.

¹³ Exec. Order 14058, “Transforming Federal Government Experience and Service Delivery to Rebuild Trust in Government,” 86 FR 71357, 71357 (Dec. 13, 2021).

Other Benefits of Direct Video Calling. DVC provides many benefits, as highlighted by panelists at the Commission's DVC Public Forum and by the Commission's Disability Advisory Committee (DAC):¹⁴

- DVC reduces the likelihood that call center representatives who are unfamiliar with or reluctant to use relay services will hang up on sign language users.
- Because both parties to a DVC call are ASL users, DVC allows callers to converse naturally, using facial, bodily actions, and other non-verbal information as necessary to convey thoughts and emotions.
- DVC allows customer service calls to be resolved efficiently and effectively, with fewer callbacks.
- Like Spanish language support lines, DVC provides direct customer support in the preferred language of many consumers who are deaf or hard of hearing.
- DVC promotes diversity, equity, and inclusion by creating job opportunities for sign language users who have hearing or speech disabilities.
- By handling customer service calls more expeditiously and satisfactorily, DVC can increase customer retention and contribute to enterprise growth.

Steps to Promote DVC. The Commission has taken steps to make DVC easy to implement. In June 2014, the Commission launched its own ASL Consumer Support Line to receive video calls and inquiries from consumers using sign language.¹⁵ In 2017, the Commission granted VTCSecure direct access to the TRS Numbering Directory to establish DVC in customer support call centers.¹⁶ In 2019, the Commission amended its rules to facilitate the routing of calls from VRS users to DVC customer support lines.¹⁷

The Commission also authorized enterprises and government agencies to use the same customer support telephone number for voice and video calls by entering the unified number into the TRS Numbering Directory.¹⁸ With a unified number, a call from a videophone can be automatically routed to a video service line staffed by an ASL-fluent agent in the customer support call center, while calls to the same customer service number from voice users continue to be routed to voice lines.¹⁹

¹⁴ See DVC Forum panelists' discussions via webcast at www.fcc.gov; see also Recommendation of the Federal Communications Commission Disability Advisory Committee on Direct Video Calling, at 2-3 (Sept. 7, 2023) (DAC DVC Report), <https://www.fcc.gov/ecfs/document/109131639123320/2>. The DAC is a Federal Advisory Committee with members from advocacy groups for individuals with disabilities, government agencies, and enterprise organizations familiar with the use and benefits of DVC.

¹⁵ For more information, visit: <https://www.fcc.gov/fcc-asl-consumer-support-line>. Other federal agencies have followed suit. See www.fcc.gov/dvc for the latest list of DVC-enabled federal agencies.

¹⁶ See *VTCSecure Waiver Order*, 32 FCC Rcd at 779-801, paras. 9-11.

¹⁷ See *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, 34 FCC Rcd 3396, 3403-08, paras. 11-21 (2019) (*2019 VRS Improvements Order*).

¹⁸ See *2019 VRS Improvements Order*, 34 FCC Rcd at 3407, para. 20. The use of single unified support numbers for DVC is available today.

¹⁹ See *id.* at 3407-08, para. 21 (requiring customer service representative to transfer DVC call to relay services should the consumer prefer that option).

Implementing DVC. The telephone numbers and IP addresses of VRS or DVC videophones must be registered in the TRS Numbering Directory.²⁰ All VRS providers and Qualified Direct Video Entities²¹ have access to the TRS Number Directory to register telephone numbers for videophones that can be used for VRS or DVC. Currently, the Commission has certified five VRS providers: Bond Communications, Inc.; Convo Communications, LLC; Sorenson Communications, LLC (branded as Sorenson VRS); Tive, LLC; and ZP Better Together (branded as Purple Communications, Inc., and ZVRS).²²

The Commission has also certified four Qualified Direct Video Entities: nWise AB, Communications Service for the Deaf, Inc. (CSD), VTCSecure, and 360 Direct Video.²³ Both individual agencies and enterprises, as well as DVC platform providers, are eligible to apply for approval as a Qualified Direct Video Entity.

Ease of Implementing DVC. Implementing DVC technology is relatively inexpensive and easy. DVC is enabled by using an automated video technology that interacts with callers with an automatic call distribution (ACD) platform that operates similarly to an audio interactive voice response (IVR)/ACD platform in a call center environment. This automated videophone technology allows incoming video calls to be routed to customer support positions equipped with a video phone or a web application on a desktop, laptop, tablet, or other mobile device. Since DVC is an Internet-based service, organizations and agencies implementing DVC in their call centers must ensure that their customer service telephone numbers are associated with an IP address. By registering telephone numbers in the TRS Numbering Directory, the telephone number will be associated with the IP address for the DVC videophone, and calls to that telephone number will be directed to the videophone.²⁴

In sum, to deploy DVC, entities need, at a minimum, high-speed Internet connection, videoconferencing equipment (*e.g.*, camera and a video screen), a call center platform, an Internet-based TRS-issued telephone number, and at least one person who is a native user of ASL to staff the line. The market provides many commercially available options for DVC. DVC call center solutions are

²⁰ See *id.* at 3403, para. 11; 47 CFR § 64.613(c)(2).

²¹ A “Qualified Direct Video Entity” is an individual or entity that is approved by the Commission for access to the TRS Numbering Directory, that is engaged in direct video customer support, and (1) is the end-user customer that has been assigned a telephone number used for direct video customer support calls or (2) is the designee of such entity. 47 CFR § 64.601(a)(37). “Direct video customer support,” in turn, is a “telephone customer support operation that enables callers with hearing or speech disabilities to engage in real-time direct video communication in ASL with ASL speakers in a call center operation.” *Id.* § 64.601(a)(16). Contact information for Qualified Direct Video Entities is available at <https://www.fcc.gov/qdve>.

²² All VRS providers are authorized to assign geographically appropriate NANP telephone numbers and enter call routing information for users in the TRS Numbering Directory. See 47 CFR § 64.611(a)(1). Contact information for VRS providers is available at <https://www.fcc.gov/general/internet-based-trs-providers>.

²³ See *360 Direct Video Approved to Access the TRS Numbering Directory as a Qualified Direct Video Entity*, CG Docket Nos. 03-123 and 10-51, Public Notice, DA 24-619 (June 28, 2024); *nWise AB Approved to Access the TRS Number Directory as a Qualified Direct Video Entity*, CG Docket Nos. 10-51 and 03-123, Public Notice, 37 FCC Rcd 1046 (CGB 2022); *Communications Service for the Deaf, Inc., Approved to Access the TRS Number Directory as a Qualified Direct Video Entity*, CG Docket Nos. 10-51 and 03-123, Public Notice, 36 FCC Rcd 9462 (CGB 2021); *VTC Waiver Order*, 32 FCC Rcd at 779-80, paras. 9-11.

²⁴ The Directory contains records mapping each user’s North American Number Plan (NANP) telephone number to a Uniform Resource Identifier (URI) that contains a server domain name or the IP address of the user’s device. See 47 CFR § 64.613(a)(1)-(2).

customizable based on the needs of an organization or agency from a single videophone to a multi-line full service call center solution.²⁵

Points to Consider and DVC Best Practices. The FCC’s Disability Advisory Committee recommends that business organizations and government agencies that implement DVC follow certain best practices:²⁶

- When the DVC service is offline, DVC calls should be answered via video mail with an option for the customer to either leave a message for a call-back or be transferred to VRS if a hearing customer service agent is available.
- Organizations and agencies should include a web-based “widget” on their websites that alerts ASL users that a DVC service is available and may be accessed by clicking the widget or by calling the organization’s toll-free number.
- Training for and support services provided to DVC agents who are deaf should be provided in ASL, and operations personnel—*e.g.*, supervisors, and human resource personnel—should be familiar with the needs of deaf individuals to effectively support these employees.
- Organizations and agencies implementing DVC should analyze call volumes from deaf consumers to develop an effective staffing model to ensure that calls from ASL users are handled efficiently and expeditiously.
- Calls made through DVC should have the same level of security, privacy, and confidentiality as voice calls and calls made through VRS.
- Organizations and agencies implementing DVC should ensure that their IT systems provide Internet speeds suitable for video communication, enable three-way video communications or overlays of text on the video stream, and provide the capability to resize video windows or mute a call.

Panelists at the Commission’s July 2024 DVC Forum made additional recommendations. For example:²⁷

- Organizations and agencies should consult with deaf and hard of hearing employees on how to best serve their community.
- Add a video in sign language on the organization’s or agency’s web site to explain to ASL-using customers how to obtain information and connect with customer service.

General information about DVC is available at: www.fcc.gov/dvc. For questions regarding DVC, contact: Bill Wallace, Attorney Advisor, Disability Rights Office, Consumer and Governmental Affairs Bureau, at 202-418-2716, William.Wallace@fcc.gov, or DVC@fcc.gov.

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²⁵ See DAC DVC Report at 3-4.

²⁶ See *id.* at 8-9.

²⁷ Additional recommendations are included in the archived 2024 DVC Forum webcast and related materials found at www.fcc.gov.