

REPORT OF CONSUMER INFORMAL COMPLAINTS

JULY 1, 2013 – JUNE 30, 2014

Top Telecommunications Relay Service (TRS) Issues

Telecommunications relay services (TRS): TRS is a telephone service that allows people who are deaf, hard of hearing, deaf-blind, or have a speech disability to place and receive telephone calls. There are several forms of TRS, depending on the particular needs of the user and the equipment available.

Forms of TRS

Traditional TRS: allows people who are deaf, hard of hearing or have a speech disability to use a teletypewriter device (TTY) to call the TRS relay center, and gives a communications assistant (CA) the number of the party that he or she wants to call. The CA at the relay center then makes a voice telephone call to the other party to the call, and relays the call back and forth between the parties by speaking what a text user types, and typing what a voice telephone user speaks.

Speech-to-Speech (STS) Relay Service: allows people who have a speech disability to use a conventional telephone to call a CA (who is specially trained in understanding a variety of speech disorders) who then repeats what the caller says in a manner that makes the caller's words clear and understandable to the called party. No special telephone is needed.

Video Relay Service (VRS): allows people who are deaf or hard of hearing to communicate in sign language with voice telephone users over a broadband Internet connection using video equipment. The video link allows the CA to view the party's signed conversation and to relay the conversation back and forth by signing what the voice telephone user says to the deaf or hard of hearing user and responding in voice to the voice telephone user.

Internet Protocol Relay (IP Relay): allows the TRS user to communicate in text messages via a computer or other similar device over a broadband Internet connection.

Captioned Telephone Service (CTS): allows people who are hard of hearing to speak directly with another party on a telephone call and to both listen to and read captions of what that party is saying, in real-time, on a captioned telephone. The captioned telephone has a text screen to display captions of what the other party to the conversation is saying.

Internet Protocol Captioned Telephone Service (IP CTS): allows people who are hard of hearing to speak directly with another party on a telephone call and to both listen to and read captions of what that party is saying. It is provided in a variety of ways, but uses the Internet – rather than the telephone network for the transmissions. An individual can access IP CTS with an IP captioned telephone, laptop computer, tablet or smartphone.

COMPLAINTS BY SERVICE

VRS: 76% of complaints (206)

IP CTS: 12% of complaints (33)

IP Relay: 3% of complaints (8)

Traditional TRS, CTS and STS: 5% of complaints (15)

Other: 4% of complaints (10)

Total: 272 complaints

COMPLAINTS BY TYPE

Speed of answer: The amount of time between the TRS provider's receipt of the call and the presence of the CA on the line ready to relay the call. 5% of complaints (13)¹.

Customer service: Includes consumer expressed dissatisfaction with the TRS provider's service or product, with the provision of technical support, and/or the conduct of a provider's employees. 13% of complaints (35).

Quality of the Communications Assistant: Encompasses an array of factors, including lack of accuracy in messaging or sign language interpreting, and the demeanor of the CA. 3% of complaints (9).

Interoperability: Pertains to the inability of a consumer's equipment to interface with a different VRS provider's network and video devices for point-to-point video calls. 13% of complaints (36).

Video mail: Refers to the inability of a consumer using one provider's video device or application to send or receive video mail (the VRS equivalent of voicemail) to or from another consumer using a different VRS provider's video device or application. 3% of complaints (9).

Marketing practices: Involves complaints in which a consumer believes he or she was not fully informed by the TRS provider's marketing/advertising/promotions, and where products and/or services may have been advertised but the consumer believes that the TRS provider did not fulfill or follow through with the promises as advertised. 12% of complaints (33).

Slamming and porting: In general, slamming occurs when a VRS provider changes a consumer's preferred VRS provider without the customer's permission. Porting involves changing the preferred VRS provider at the request of the consumer. Porting problems may arise if the exiting service provider is not cooperative in releasing the consumer's telephone number to the consumer's new relay service provider. 13% of complaints (35).

¹ The number in parentheses represents the number of complaints received out of 272 complaints.

Refusal to accept TRS calls: Occurs when the intended recipient of a call placed through a relay service refuses to accept the call because it is being placed through a relay service. If the intended recipient is a business or place of public accommodation, this type of complaint is usually referred by the Disability Rights Office to the Department of Justice as a potential rule violation under the Americans with Disabilities Act. 10% of complaints (27).

Problems due to bandwidth: This refers to difficulties caused by a consumer's Internet provider affording insufficient data throughput to enable the consumer to reliably utilize their Internet-based relay service. 4% of complaints (11).

Data cap/pricing: Involves difficulties caused by a consumer having purchased a data plan that turns out to be insufficient to meet the consumer's data needs; may include having to pay excessive charges to obtain sufficient data capacity. 7% of complaints (19).

Policy issues: Involves complaints where the consumer has an issue with specific rules and policies of the Commission or the effects they have on TRS providers. 10% of complaints (26).

Other miscellaneous complaints: Complaints not falling into one of the foregoing categories. 7% of complaints (20).

TIME BETWEEN RECEIPT OF COMPLAINT AND RESOLUTION

0 – 30 Days: 27% of complaints (75).

31 – 90 Days: 57% of complaints (155).

91 – 180 Days: 12% of complaints (34).

181 – 365 Days: 4% of complaints (10).