



# PUBLIC NOTICE

**Federal Communications Commission**  
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## REQUEST FOR COMMENT ON PETITION FOR RULEMAKING TO REQUIRE A COMMUNICATIONS ASSISTANT OPTION FOR IP CTS

**CG Docket Nos. 13-24 & 03-123**  
**RM-11987**

**Comments Due: September 3, 2024**  
**Reply Comments Due: September 16, 2024**

The Consumer and Governmental Affairs Bureau (CGB or Bureau) of the Federal Communications Commission (Commission) seeks comment on petition for rulemaking filed by TDIforAccess, Inc. (TDI), the National Association of the Deaf (NAD), and Hearing Loss Association of America (HLAA) (Accessibility Organizations).<sup>1</sup>

The Accessibility Organizations seek reversal of a prior Commission decision allowing IP CTS providers to rely exclusively on automatic speech recognition (ASR) to generate captions for Internet Protocol Captioned Telephone Service (IP CTS), a relay service supported by the Interstate Telecommunications Relay Services Fund.<sup>2</sup> They ask the Commission to amend its rules to require all IP CTS providers to give users the option at the start of a call, or at any point thereafter during the call, of choosing to have a CA generate captions.<sup>3</sup> The Accessibility Organizations also request that the Commission refrain from certifying any further ASR-only IP CTS providers pending the completion of the requested rulemaking proceeding, and that the Commission complete its open proceeding to establish clear, technology-neutral performance goals and metrics for IP CTS.<sup>4</sup>

*Filing Requirements.* Interested parties may file comments on the Petition on or before the dates indicated on the first page of this document. All filings must reference CG Docket Nos. 13-24, 03-123, and RM-11987. Comments may be filed using the Commission's Electronic Comment Filing System (ECFS).<sup>5</sup>

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<sup>1</sup> Petition for Rulemaking to Require Option for Communications Assistants by Stand-Alone Automatic Captioning Providers (filed May 31, 2024), available at <https://www.fcc.gov/ecfs/document/10531086287963/1> (Accessibility Organizations Petition).

<sup>2</sup> Accessibility Organizations Petition at 3 (citing *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, Declaratory Ruling, Further Notice of Proposed Rulemaking, and Notice of Inquiry, 33 FCC Rcd 5800, 5827, para. 48 (2018) (*2018 IP CTS Order*)).

<sup>3</sup> Accessibility Organizations Petition at 1.

<sup>4</sup> *Id.* at 1-2.

<sup>5</sup> See *Electronic Filing of Documents in Rulemaking Proceedings*, 63 FR 24121 (1998).

- *Electronic Filers:* Comments may be filed electronically using the Internet by accessing the ECFS: <https://www.fcc.gov/ecfs>.
- *Paper Filers:* Parties who choose to file by paper must file an original and one copy of each filing.
  - Filings can be sent by hand or messenger delivery, by commercial courier, or by the U.S. Postal Service. **All filings must be addressed to the Secretary, Federal Communications Commission.**
  - Hand-delivered or messenger-delivered paper filings for the Commission’s Secretary are accepted between 8:00 a.m. and 4:00 p.m. by the FCC’s mailing contractor at 9050 Junction Drive, Annapolis Junction, MD 20701. All hand deliveries must be held together with rubber bands or fasteners. Any envelopes and boxes must be disposed of before entering the building.
  - Commercial courier deliveries (any deliveries not by the U.S. Postal Service) must be sent to 9050 Junction Drive, Annapolis Junction, MD 20701.
  - Filings sent by U.S. Postal Service First-Class Mail, Priority Mail, and Priority Mail Express must be sent to 45 L Street NE, Washington, DC 20554.

*Ex Parte Requirements.* The proceeding this Notice initiates shall be treated as a “permit-but-disclose” proceeding in accordance with the Commission’s ex parte rules.<sup>6</sup> 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 (braille, large print, electronic files, audio format), send an e-mail to [fcc504@fcc.gov](mailto:fcc504@fcc.gov) or call the Consumer and Governmental Affairs Bureau at 202-418-0530.

For further information, please contact Ross Slutsky by email at [Ross.Slutsky@fcc.gov](mailto:Ross.Slutsky@fcc.gov).

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<sup>6</sup> 47 C.F.R. §§ 1.1200 *et seq.*