

Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities; Emergency Access NPRM; IP Relay/VRS Fraud FNPRM; and Interoperability Declaratory & FNPRM, CG Docket No. 03-123

SUPPORTING STATEMENT

A. Justification.

Revised Information Collection Requirements:

The Commission is consolidating information collection OMB Control Number 3060-1091 (VRS Interoperability, Declaratory Ruling and Further Notice of Proposed Rulemaking, CG Docket No. 03-123) into OMB Control Number 3060-1089 (Emergency Access Notice of Proposed Rulemaking and IP Relay/VRS Fraud Further Notice of Proposed Rulemaking) per OMB's request. The Commission will submit a 83-D Form to discontinue information collection 3060-1091 once it receive OMB approval for this information collection (3060-1089) which is being revised due to the consolidation. **(This is the only change to this information collection since the Commission last received OMB approval.)**

History:

On November 30, 2005, the Commission released an *Emergency Access Notice of Proposed Rulemaking (2005 Emergency Access NPRM)*, In the Matter of Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities, CG Docket No. 03-123, FCC 05-196. In the *Emergency Access NPRM*: 1089

- (a) The Commission has sought ways in which it may ensure that the communications assistant (CA) will be able to call the appropriate Public Safety Answering Point (PSAP) when a video relay service (VRS)¹ or an Internet-Protocol (IP) Relay² user calls the relay provider and asks the CA to call emergency services.
- (b) The Commission has also sought comment on whether, and if so, how, to ensure that persons using VRS and IP Relay will have access to emergency services and what the effect(s) may be on the telecommunications relay service (TRS)³ funding mechanism.

The *2005 Emergency Access NPRM* contained the following information collection requirements for the five (5) components associated with the *User Registration* requirements, e.g., when callers register to use VRS and IP Relay and provide their requisite automatic number identification (ANI) and automatic location identification (ALI) as necessary:

¹ VRS is a form of Telecommunications Relay Service that that enables the VRS user and the CA to communicate via a video link in sign language, rather than through text. VRS presently requires a broadband Internet connection.

² IP Relay is a text-based form of TRS that uses the Internet, rather than the PSTN, for the link of the call between the relay user and the CA.

³ The traditional procedures for TRS occur when a person with a hearing or speech disability initiates the call by dialing (i.e., typing) a telephone number for a TRS facility using text telephone (TTY), and then types the number of the party he or she desires to call. This person then types the number of the party he or she desires to call. The communications assistant (CA), in turn, places an outbound voice call to the called party. The CA serves as the ling in the conversation converting all typed TTY messages from the caller into voice messages for the called party, and all voice messages from the called party into typed messages for the TTY user.

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The 2005 *Emergency Access NPRM* sought comment on:

A. *Registered Location.*

- (1) Whether the Commission should require VRS and IP Relay service providers to establish a registration process in which VRS and IP Relay users provide, in advance, the primary location from which they will be making VRS and IP Relay calls (“Registered Location”), so that a CA can identify the appropriate PSAP to contact.
- (2) Whether VRS and IP Relay providers should be required similarly:
 - (a) to register their customers, and
 - (b) to obtain a Registered Location from their customers so that they will be able to make the outbound call to the appropriate PSAP.
- (3) Whether there are other means by which VRS and IP Relay service providers may obtain Registered Location information, for example, by linking the serial number of the customer’s VRS or IP Relay service terminal or equipment to their registered location.
- (4) Whether the Commission should require specific information and/or place limits on the scope of information that providers should be able to obtain, assuming some type of location registration requirement is adopted.
- (5) How the Commission might ensure that providers have updated location information.

B. *Customer Notification.*

Whether the Commission should require that VRS and IP Relay providers specifically advise new and existing subscribers of the circumstances under which E911 emergency service may not be available through VRS and IP Relay or may be in some way limited by comparison to traditional E911 service.

C. *User Notification.*

Whether the Commission should require VRS and IP Relay providers to issue appropriate warning labels for installation on customer premises equipment (CPE) used in connection with VRS and IP Relay services. The warning labels would serve to notify customers of the potential limited E911 service under certain circumstances.

D. *Record of Customer Notification.*

Whether the Commission should require VRS and IP Relay providers to obtain and keep a record of affirmative acknowledgement by every subscriber that the subscriber has received and has understood this advisory:

E911 service may not be available through VRS and IP Relay or may be in some way limited by comparison to traditional E911 service.

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E. Compliance Requirement.

- (1) How the Commission may ensure that providers have the consumer's updated information, and what are the respective obligations of the providers and the consumers in this regard.
- (2) Whether the providers' receipt of compensation from the Interstate TRS Fund should be conditioned on compliance with such proposed requirements.⁴

On May 8, 2006, the Commission released a *Further Notice of Proposed Rulemaking (FNPRM)*, In the Matter of Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities; Misuse of Internet Protocol (IP) Relay Service and Video Relay Service (VRS) (*2006 IP Relay Fraud FNPRM*), CG Docket No. 03-123, FCC 06-58. In this *2006 IP Relay Fraud FNPRM*: 1089

- (a) The Commission sought ways to curtail the misuse of IP Relay and VRS.
- (b) The Commission also sought comments on whether it should waive or modify certain TRS rules to permit IP Relay providers and their CAs to screen out and, where appropriate, terminate calls they determine are not legitimate TRS calls.
- (c) The Commission sought comments on whether the IP Relay or VRS provider or its CAs should be given the discretion to determine that a call is not a legitimate IP Relay or VRS call, and to terminate the call.

The *2006 IP Relay Fraud FNPRM* contains the following information collection requirements involving user registration, *e.g.*, callers register to use VRS and IP Relay and provide their requisite information as necessary:

The *2006 IP Relay Fraud FNPRM* sought comment on:

- (1) Whether IP Relay and VRS providers should be required to implement user registration system in which users provide certain information to their providers, in advance, as a means of curbing illegitimate IP Relay and VRS calls.
- (2) Whether there are steps that could be taken, or technology implemented, to prevent the wrongful use of registration information.
- (3) Whether the Commission should require VRS and IP Relay providers to maintain records of apparently illegitimate calls that were terminated by the providers.

⁴ The Interstate TRS Fund compensates providers of eligible interstate TRS services for their reasonable costs of providing service. Providers of eligible interstate TRS services are required to meet mandatory minimum standards in order to be compensated for the provision of TRS services.

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On May 9, 2006, the Commission released a *Declaratory Ruling and Further Notice of Proposed Rulemaking*, In the Matter of Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities (*2006 Interoperability Declaratory Ruling & FNPRM*), CG Docket No. 03-123, FCC 06-57. In this *2006 Interoperability Declaratory Ruling & FNPRM: (Consolidated collection)*

- (a) The Commission sought comment on the feasibility of establishing a single, open, and global database of proxy numbers for VRS users that would be available to all service providers, so that a hearing person can call a VRS user through any VRS provider, and without having first to ascertain the VRS user's current IP address.
- (b) The Commission also sought comment on nature of the proxy numbers that might be used and how they might be administered.
- (c) The Commission also sought comments on the role of the Commission in creating and maintaining the database of proxy numbers.

The *2006 Interoperability Declaratory Ruling & FNPRM* contains the following information collection requirements involving an open, global database of VRS proxy numbers.

The *2006 Interoperability Declaratory Ruling & FNPRM* sought comment on:

- (1) Whether VRS providers should be required to provide information to populate an open, global database of VRS proxy numbers and to keep the information current.
- (2) Whether the Interstate TRS Fund administrator, a separate entity, or a consortium of service providers should be responsible for the maintenance and operation of an open, global database of VRS proxy numbers.
- (3) Whether deaf and hard of hearing individuals using video broadband communication should be linked to the North American Numbering Plan (NANP) for uniform and static end-point numbers, which would remain consistent across all VRS providers so that they can contact one another and be contacted to the same extent that Public Switched Telephone Network (PSTN)⁵ and VoIP⁶ users are able to identify and call one another.
- (4) Whether participation by service providers should be mandatory so that all VRS users can receive incoming calls.

As noted on the OMB Form 83-I, this information collection does not affect individuals or households, and thus, there are no impacts under the Privacy Act. However:

- (a) Information that is related to individuals or households is collected by a third party, the VRS and IP Relay providers

⁵ The Public Switched Telephone Network or PSTN is a telephone system based on wires carrying analog voice data.

⁶ The Video over Internet Protocol or VoIP is a technology that allows you to make telephone calls using a broadband Internet connection instead of a regular (or analog) phone line.

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- (b) The Commission has no direct involvement in the collection of this information on individuals and households.⁷ Nonetheless, the Commission is cognizant of potential privacy issues and has taken these actions:
- (1) Because the Commission has not decided how VRS and IP Relay providers will detail their compliance with the rules proposed in the *2005 Emergency Access NPRM*, *2006 IP Relay Fraud FNPRM*, and the *2006 Interoperability Declaratory Ruling & FNPRM*, the Commission is not asking respondents to submit confidential information.
 - (2) If the Commission requests that respondents submit information that the respondents believe is confidential, respondents may request confidential treatment of such information pursuant to 47 CFR § 0.459.
 - (3) Moreover, the Commission requires the National Exchange Carrier Association, Inc. (NECA), in its role as the Interstate TRS Fund Administrator (TRS Fund Administrator),⁸ to keep all data from contributors and TRS providers confidential.
 - (4) The TRS Fund Administrator shall not disclose such data in company specific form unless directed to do so by the Commission.⁹

The statutory authority for the information collection requirements is found at Sec. 225 [47 U.S.C. 225] Telecommunications Services for Hearing-Impaired and Speech-Impaired Individuals; The Americans with Disabilities Act of 1990 (ADA), Public Law 101-336, 104 Stat. 327, 366-69, was enacted on July 26, 1990.

⁷ Although the FCC has no direct involvement in the collection of this information on individuals or household, the Commission does require the VRS and IP Relay providers to abide by the requirements of 47 C.F.R. 64.604(a)(2) which states that:

"(i) [Communication Assistants (CA)] are prohibited from disclosing the content of any relayed conversation regardless of content, and with a limited exception for Speech-to-Speech CAs, from keeping records of the content of any conversation beyond the duration of a call, even if to do so would be inconsistent with state or local law."

Section 64.604(a)(2)(ii) further states that:

"CAs are prohibited from intentionally altering a relayed conversation and, to the extent that it is not inconsistent with federal, state or local law regarding use of telephone company facilities for illegal purposes, must relay all conversation verbatim unless they relay user specifically requests summarization, or if the user requests interpretation of an American Sign Language (ASL) call."

Section 64.604(a)(2)(ii) also states:

"Appropriate measures must be taken by relay providers to ensure that confidentiality of VRS users is maintained."

The Commission believes, therefore, that 47 C.F.F. 64.604(a)(2)(i) and (ii) provides sufficient safeguards to protect the information on individuals or households that the VRS and IP Relay providers collect as part of their responsibilities, which relieves the Commission of its requirement to complete a privacy impact assessment.

⁸ On July 20, 1993, NECA was appointed the Interstate TRS Fund Administrator. Currently, NECA's contract as the Interstate TRS Fund Administrator has been extended on a month to month basis.

⁹ See 47 CFR § 64.604 (c) (5) (iii).

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2. In the *2005 Emergency Access NPRM*,

- (a) the information collection requirements would require VRS and IP Relay service providers to: (1) to collect certain information, *i.e.*, caller's primary location and (2) to take other actions in complying with the Commission's rules that require such service providers to provide E911 service capabilities for their customers.
- (b) VRS and IP Relay providers would be required to: (1) to obtain from each customer, prior to the initiation of service, the physical location at which the service will first be utilized, and (2) to provide customers a way to update this information *i.e.*, the "Registered Location."¹⁰
- (c) The proposed rules would require VRS and IP Relay providers specifically to: (1) to advise new and existing subscribers of the circumstances under which E911 service may not be available through VRS and IP Relay or may be in some way limited by comparison to traditional E911 service, and (2) to obtain and keep a record of affirmative acknowledgement by every subscriber of having received and understood this advisory.

In the *2006 IP Relay Fraud FNPRM*,

- (a) the existing information collection requirements would require VRS and IP Relay service providers: (1) to collect certain information, *i.e.*, caller's name and location, and (2) to maintain records consistent with Section 225(d)(F)¹¹ in complying with the Commission's rules that require such service providers to implement user registration, and (3) to obtain from each customer, prior to the initiation of service, the identifying information of the customers.

In the 2006 Interoperability Declaratory Ruling & FNPRM

- (a) the collection requirements would require VRS service providers: (1) to collect certain information, *i.e.*, caller's dialing numbers, and (2) to maintain records consistent with Section 225(d)(F) in complying with the Commission's rules that require such service providers to provide information to populate an open, global database of VRS proxy numbers.
3. In the *2005 Emergency Access NPRM*, the Commission anticipated that many VRS and IP Relay providers would require their customers to update their information location via the Internet.

In the *2006 IP Relay Fraud FNPRM*, the Commission anticipated that many VRS and IP Relay providers will require their customers to provide the identifying information via the Internet and that the providers will maintain records of terminated calls that are apparently illegitimate.

In the *2006 Interoperability Declaratory Ruling & FNPRM*, the Commission anticipated that many VRS providers will require their customers to provide certain information, *i.e.*, the

¹⁰ The term "Registered Location" is defined in the *2005 Emergency Access NPRM*, *supra*, at para. 15.

¹¹ 47 U.S.C. § 225(d)(F) (prohibiting CAs from "keeping records of the content" of any call beyond the duration of the call).

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caller's dialing numbers, needed to populate the database. The Commission also anticipated that many VRS providers will maintain and update records of their customers' proxy number information on a regular continuous basis.

4. With the consolidation of the requirements from 3060-1091 into information collection 3060-1089, the information will not be duplicated elsewhere. No similar information will be available.
5. The Commission believes the proposed information collection requirements would not a significant economic impact on a substantial number of small entities/businesses if adopted by the Commission.
6. If such an information collection is not completed, VRS and IP Relay providers may be:
(a) under-compensated for provision of relay services; (b) the consumers of both VRS and IP Relay may experience difficulty in using these services; and (c) the consumers of both VRS and IP Relay may not have access to E911 emergency service.
7. The collections are not being conducted in any manner inconsistent with the guideline of 5 CFR § 1320.5(d)(1).
8. The Commission published a notice in the *Federal Register* pursuant to 5 CFR §1320.8(d) on June 6, 2007. See 72 FR 31327, June 6, 2007.
9. The Commission does not anticipate providing any payment or gift to any respondents.
10. Because the Commission has not decided how VRS and IP Relay providers will detail their compliance with the rules proposed in the *2005 Emergency Access NPRM*, *2006 IP Relay Fraud FNPRM*, and the *2006 Interoperability Declaratory Ruling & FNPRM*, the Commission is not asking respondents to submit confidential information. If the Commission does ask that respondents submit information which the respondents believe is confidential, respondents may request confidential treatment of such information pursuant to 47 CFR § 0.459. Moreover, the Commission requires NECA, the Interstate TRS Fund Administrator (TRS Fund Administrator),¹² to keep all data from contributors and TRS providers confidential. The TRS Fund Administrator shall not disclose such data in company specific form unless directed to do so by the Commission.¹³
11. This information collection does not address any private matters of a sensitive nature.

¹² On July 20, 1993, NECA was appointed the Interstate TRS Fund Administrator. Currently, NECA's contract as the Interstate TRS Fund Administrator has been extended on a month to month basis.

¹³ See 47 CFR § 64.604 (c) (5) (iii).

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12. Estimates of the burden hours for this information collection are as follows:

The Commission estimated that there are approximately 8 VRS and IP Relay providers that will be affected by this collection.¹⁴

2005 Emergency Access NPRM information collection requirements

COMPONENTS FOR THE USER REGISTRATION REQUIREMENT

- (a) Because 6 of the 8 TRS providers provide both forms of TRS - VRS and IP Relay services,¹⁵ they will be required to establish separate registration processes for each TRS service provided.
- (b) The remaining 2 providers for VRS will be required to establish one registration process for its TRS service.

6 VRS and IP Relay providers + 2 VRS providers = 8 providers

In the *2005 Emergency Access NPRM*, the Commission sought comment on the following:

A. *Registered Location.*

- (1) The Commission estimated that 8 respondents will be required to establish a registration process for each TRS service, *i.e.*, such as VRS and IP Relay service, offered.

This registration process will be done “annually.”

The Commission estimated that 8 respondents will require approximately 1,000 hours to complete the registration process for both VRS and IP Relay Services.¹⁶

The Commission also estimated that approximately 5 millions deaf and hard of hearing consumers will register their information “one-time” with VRS and IP Relay Providers.

- (2) Once the database is initially populated, some maintenance work will be required.

The Commission estimated that both the VRS/IP Relay Providers¹⁷ and VRS Providers each require approximately 8 hours per month to maintain the database:

¹⁴ 6 providers offer VRS and IP Relay services, and 2 providers offers only VRS.

¹⁵ The Commission calculated its burden for the respondents as VRS/IP Relay Providers. Therefore, the burden hours for VRS/IP Relay account for two services and therefore will be reflected in the burden.

¹⁶ Each service will require 1,000 each for a total of 2,000 hours for VRS/IP Relay Providers and 1,000 hours for VRS Providers.

¹⁷ 8 hrs/month/VRS provider + 8 hours/month/IP Relay providers = 16 hours/month

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Each VRS/IP Relay Provider would have 2 responses per month and each VRS Provider would have one response per month.

B. Customer Notification.

- Should VRS and IP Relay providers specifically advise new and existing subscribers of the circumstances under which E911 service may not be available through VRS and IP Relay or may be in some way limited by comparison to traditional E911 service.

(1) The Commission estimated that 8 respondents will comply with the requirement.

This is a “one-time” major event.

The Commission believed that respondents will expend approximately 80 hours per service, *e.g.*, VRS/IP Relay Service¹⁸ and VRS Service per respondent to complete this customer notification requirement:

Each VRS/IP Relay Provider would have 2 responses per month and each VRS Provider would have one response per month.

(2) This requirement will require respondents to conduct routine maintenance work to ensure that VRS/IP Relay service and VRS service are operable.

The process will be done “monthly.”

The Commission believed that it will require approximately 8 hours¹⁹ to complete using “in house” staff for each service.

Each VRS/IP Relay Provider would have 2 responses per month and each VRS Provider would have one response per month.

C. User Notification.

- Should the Commission require VRS/IP Relay providers and VRS providers to provide appropriate warning labels for installation on customer premises equipment (CPE) used in connection with VRS and IP Relay services.

If this requirement is adopted, the Commission estimated that 8 respondents will provide appropriate warning labels for installation on CPE’s used in connection with VRS/IP Relay services and VRS service.

This process will be done “monthly.”

¹⁸ 80 hrs/VRS notification + 80 hrs/IP Relay notification = 160 hours

¹⁹ 8 hrs/mo/VRS service + 8 hrs/mo/IP Relay service = 16 hours/month. Also, there will be an additional 8 hours for VRS providers. Each service will require 8 hours to complete.

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The Commission estimated that the warning label installation will require approximately 4 hours per respondent²⁰ for each service.

D. Record of Customer Notification.

- Should VRS and IP Relay providers be required to obtain and keep a record of affirmative acknowledgement by every subscriber of having received and understood the advisory that E911 service may not be available through VRS and IP Relay or may be in some way limited by comparison to traditional E911 service.

The Commission estimated that approximately 8 respondents will obtain and keep a record of acknowledgement by every subscriber of having received and understood the advisory, which the Commission estimated that the requirements will require 4 hours per month to complete.

For VRS/IP Relay service the information requirements includes a recordkeeping requirement.²¹ The recordkeeping requirement for VRS provider is 4 hours/month/requirement.

Each VRS/IP Relay Provider would have 72 records kept per month for a total of 144 records, and each VRS Provider will have 2 records per month for a total of 24 records.

E. Compliance Requirement.

- In the 2005 *Emergency Access NPRM*, the Commission sought comment on:
 - (1) How the Commission might ensure that VRS and IP Relay providers have current location information, *i.e.*, that the *Registered Location* is the actual location of user when making a particular call.
 - (2) How the Commission might ensure that providers have updated information and the respective obligations of the providers and the consumers in this regard.
- The Commission also sought comment on whether the providers' receipt of compensation from the Interstate TRS Fund should be conditioned on compliance with such requirement.
 - (1) The Commission believed that respondents will put in place a standardized procedure which will minimize the amount of time to address this requirement, *e.g.*, automatic database, updating mechanisms, notification to customers, etc.

Thus, the Commission estimated that respondents will spend 10 hours²² per month on each of these procedures.

²⁰ 4 hours for VRS service + 4 hours IP Relay service = 8 hours for each requirement. VRS providers will also require 4 hours to complete the requirement.

²¹ 4 hours/month for each VRS provider + 4 hours/month for each IP Relay provider = 8 hours each requirement. VRS providers will also require 4 hours/month for each requirement.

²² For VRS/IP providers this is a total of 20 hours – 10 hours/month VRS + 10 hours/month for IP Relay.

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2006 IP Relay Fraud FNPRM Information Collection Requirements

F. User Registration

- Should VRS and IP Relay service providers establish a registration process in which VRS and IP Relay users provide, in advance, the identifying information of the location from which they will be making VRS and IP Relay calls as a way to curtail misuses of these calls. The information collection requirement is similar to the information collection requirements in *A. Registered Location* (1) above that were proposed in the *2005 Emergency Access NPRM*. Thus, the Commission estimates that this additional requirement will have minimal to no additional impact on the burden estimates for these respondents.

G. Record of Illegitimate Calls

- Should VRS and IP Relay providers be required to maintain records of terminated calls that they determined to be “illegitimate.”

The Commission estimated that the same 8 respondents²³ noted in the *2005 Emergency Access NPRM* will maintain records of terminated calls that were determined illegitimate, which the Commission estimates that the requirements will require 8 hours per month to complete.

Each VRS/IP Relay Provider would have 72 records kept per month for a total of 144 records, and each VRS Provider will have 2 records per month for a total of 24 records kept per month.

*H. Registered Location -- Populating Database for VRS Services²⁴
(CONSOLIDATED Collection)*

In the *2006 Interoperability Declaratory Ruling & FNPRM*, the Commission sought comment on the following:

- Should VRS service providers be required to provide information to populate the database.

(1) The Commission estimated that 8 respondents will be required to establish a process to gather information from their customers for the purpose of populating the database.

The Commission estimated that 8 respondents will require approximately 1,000 hours establishing the process for populating the database for VRS Services:

The Commission also estimated that approximately 2.5 millions deaf and hard of hearing consumers will provide their information “one-time” with VRS Providers.

²³ 8 hours/month for VRS providers + 8 hours/month for IP Relay providers = 16 hours. VRS requires 8 hours to complete the requirement as well.

²⁴ With this consolidated requirement VRS providers are the only respondents to this requirement.

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(2) Once the process is initially established, some ongoing maintenance work will be required.

The Commission estimated that the 8 respondent VRS Services each require approximately 40 hours per month to maintain and populate the database periodically:

The Commission also assumed that approximately 20% of the deaf and hard of hearing consumers will provide updated information to populate the database on annual basis.

Annual “In-House Cost”:

The Commission assumed that respondents will use “in-house” personnel whose pay is comparable to mid-to-senior level federal employees (GS-15/1, plus 30% overhead) to complete all of the tasks mentioned throughout question 12 of this supporting statement. Therefore, the Commission estimates respondents’ cost to be about \$68.74/hour to complete.

CUMULATIVE TOTAL FOR THE INFORMATION COLLECTION REQUIREMENTS:²⁵

Cumulative Total Number of Respondents: 8

Cumulative Total Number of Responses: 8,001,022

Cumulative Total Annual Hourly Burdens: 34,016 hours

Cumulative Total Annual “In-House” Costs: \$2,338,258

²⁵ This total includes the consolidation of 3060-1091 into 3060-1089.

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3060-1089	Number of Respondents	Respondent Hour Burden	Annual Hourly Burden	Total Responses	Hourly "In-House" Cost	Total "In-House" Cost
A. Registered Location						
(1) Location Registration						
TRS – VRS/IP Relay Providers	6	2,000	12,000		\$68.74	\$824,880
TRS – VRS Providers	2	1,000	2,000		\$68.74	\$137,480
Consumers registration information	5,000,000	---	---	5,000,000	---	---
(2) Maintenance work						
TRS – VRS/IP Relay Providers	6	16 hrs/month x 12 months (8 hrs/service/mo)	1,152	144	\$68.74	\$79,188
TRS – VRS Providers	2	8 hrs/month x 12 months	192	24	\$68.74	\$13,198
B. Consumer Notification						
(1) "One time" notification compliance						
TRS – VRS/IP Relay Providers	6	160 hrs (80 hrs/ service)	960	12	\$68.74	\$65,990
VRS Providers	2	80 hrs/service	160	2	\$68.74	\$10,998
(2) Maintenance work						
TRS – VRS/IP Relay Providers	6	16 hrs/month x 12 months (8 hrs/ service)	1,152	144	\$68.74	\$79,188
TRS – VRS Providers	2	8 hrs/month x 12 months	192	24	\$68.74	\$13,198
C. User Notification						
TRS – VRS/IP Relay Providers	6	8 hrs/month x 12 months (4 hrs/service/mo)	576	144	\$68.74	\$39,594
TRS – VRS Providers	2	4 hrs/month x 12 months	96	24	\$68.74	\$6,599
D. Customer Notification Records						
TRS – VRS/IP Providers recordkeeping	6	8 hrs/mo x 12 mons. (4/hr/service/mo)	576	144	\$68.74	\$39,594
TRS – VRS Providers recordkeeping	2	4 hrs/month x 12 months	96	24	\$68.74	\$6,599
E. Compliance Requirement						
TRS – VRS/IP Relay Providers	6	20 hrs/month x 12 months (10 hrs/service/mo)	1,440	144	\$68.74	\$98,986
TRS – VRS Providers	2	10 hrs/month x 12 months	240	24	\$68.74	\$16,498
F. User Registration						
TRS – VRS/IP Providers	6	–	–	–	–	–
TRS – VRS Providers	2	–	–	–	–	–
G. Record of Illegitimate Calls						
VRS – IP Relay Providers recordkeeping	6	16 hrs/month x 12 months (8 hrs/ service)	1,152	144	\$68.74	\$79,188
VRS Providers recordkeeping	2	8 hrs/month x 12 months	192	24	\$68.74	\$13,198
H. Registered Location²⁶						
TRS – VRS Providers						
(1) Populating database for VRS services	8	1,000	8,000	2,500,000	\$68.74	\$549,920
(2) Maintenance work	8	40 hours/month x 12 months	3,840	500,000	\$68.74	\$263,962
TOTALS:	8		34,016 hours	8,001,022	-	\$2,338,258

²⁶ Burden being consolidated from 3060-1091 into 3060-1089.

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13. VRS and IP Relay providers may incur some cost for the following: (a) to establish a registration process for VRS and IP Relay providers; (b) establishment of a process to populate the database for VRS providers; (c) maintain records of calls that were terminated due to misuse of such calls (“illegitimate calls”), and (d) to maintain and update records of VRS customers’ dynamic IP address.

Providers will be reimbursed indirectly when they received compensation from the Interstate TRS Fund for providing such service. Thus:

- (a) Total annualized capital/start-up cost: \$0
- (b) Total annual costs (operation and maintenance): \$0
- (c) Total annualized cost requested: \$0

14. The Commission believed that the costs to the Federal Government will be the cost for VRS and IP Relay providers to comply with the “*Compliance Requirement*” associated with the establishment of a “*User Registration*” and for VRS providers to comply with the requirement for the establishment of populating the database process.

“*Compliance Requirement*”

The Commission will administer the compliance reports filed by VRS and IP Relay providers (“using Commission staff”): The Commission will use staff attorneys at the GS-14/5 level to process annual compliance reports filed by VRS and IP Relay providers. The Commission estimated the time to process each compliance report to be approximately 2 hours. On average, the Commission estimated that it will receive approximately 168 compliance reports annually:

168 compliance reports x 2 hours/processing time x \$50.95 = \$17,119.20
 30% overhead = \$ 5,135.76
Total cost to the Federal Government: \$22,254.96

“*VRS Providers Establishment of Populating Database Process*”

The Commission will administer the compliance reports filed by VRS providers (“using Commission staff”): The Commission will use staff attorneys at the GS-14/5 level to process annual compliance reports filed by VRS providers. The Commission estimated the time to process each compliance report to be approximately 2 hours. On average, the Commission estimated that it will receive approximately 168 compliance reports annually:

168 compliance reports x 2 hours/processing time x \$50.95 = \$17,119.20
 30% overhead = \$ 5,135.76
Total cost to the Federal Government: \$22,254.96

Cumulative Total to Federal Government: \$44,509.92

15. There is an adjustment to the total annual burden hours and the total annual cost burden due

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to the consolidation of information collection OMB Control Number 3060-1091 (Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities; Interoperability Declaratory Ruling & FNPRM, CG Docket No. 03-123) into OMB Control Number 3060-1089 (Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities; Emergency Access NPRM; IP Relay/VRS Fraud FNPRM) per OMB's request, and the re-evaluation of certain information collection requirements. There are no program changes to this information collection.

16. There are no plans to publish the result of the collection of information.
17. The Commission is not seeking approval not to display the expiration date for OMB approval of this information because the collection does not include a form number.
18. In the 30 day *Federal Register* Notice published on September 13, 2007 at 72 FR 52374, the Commission reported the total annual burden to be 34,688 hours. The Commission corrects the total annual burden to be 34,016 hours. There are no other exceptions to Item 19, "Certification for Paperwork Reduction Act Submission," on OMB Form 83-I.

B. Collections of Information Employing Statistical Methods

The Commission does not anticipate that the collection of information will employ statistical methods.