

Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities; E911 Requirements for IP-Enabled Service Providers; Internet-Based Telecommunications Relay Service Numbering, CG Docket No. 03-123, WC Docket No. 05-196, and WC Docket No. 10-191; FCC 08-151, FCC 08-275, FCC 11-123

## SUPPORTING STATEMENT

### A. Justification

1. The Commission submits this revised information collection to the Office of Management and Budget (OMB) to modify and extend the information collection requirements under OMB Control Number 3060-1089 related to the telephone numbering system and enhanced 911 (E911) requirements for Internet-based telecommunications relay service (TRS) providers.

#### **History:**

Title IV of the Americans with Disabilities Act of 1990 required the creation of a nationwide TRS program to enable access to the nation's telephone network by persons with hearing and speech disabilities.<sup>1</sup> TRS must be available to the extent possible and in the most efficient manner,<sup>2</sup> and provide access to the telephone system that is "functionally equivalent" to voice telephone services,<sup>3</sup> as reflected in the TRS mandatory minimum standards established by the Commission.<sup>4</sup>

Between 2008 and 2011, the Commission adopted rules in three separate orders to ensure numbering and E911 services to users of two forms of Internet-based TRS: Video Relay Service (VRS); and Internet Protocol Relay Service (IP Relay).<sup>5</sup> VRS and IP Relay users had not previously had a reliable or consistent means by which others could identify or reach them because these services had not been linked to a uniform telephone numbering scheme.

#### **First Numbering Order**

On June 11, 2008, the Commission adopted the *First Numbering Order* (FCC 08-151) setting forth rules requiring VRS and IP Relay providers to supply numbering and E911 capabilities to their users by, among other things, integrating VRS and IP Relay users into the ten-digit numbering system known as the North American Numbering Plan (NANP).

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<sup>1</sup> Pub. L. No. 101-336, § 401, 104 Stat. 327, 336-69 (1990); 47 U.S.C. § 225.

<sup>2</sup> 47 U.S.C. § 225(b)(1).

<sup>3</sup> 47 U.S.C. § 225(a)(3).

<sup>4</sup> 47 U.S.C. § 225(d)(1)(B); 47 CFR § 64.601 (Mandatory Minimum Standards).

<sup>5</sup> *Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities; E911 Requirements for IP-Enabled Service Providers*, Report and Order and Further Notice of Proposed Rulemaking, 23 FCC Rcd 11591 (2008) (*First Numbering Order*); *Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities; E911 Requirements for IP-Enabled Service Providers*, Second Report and Order and Order on Reconsideration, 24 FCC Rcd 791 (2008) (*Second Numbering Order*); *Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities; E911 Requirements for IP-Enabled Service Providers; Internet-Based Telecommunications Relay Service Numbering*, Report and Order, 26 FCC Rcd 11779 (2011) (*iTRS Toll Free Order*).

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To complete a telephone call to an Internet-based TRS user, a provider must have some method of logically associating the telephone number dialed by the caller to the Internet-based TRS user's device. That method, known as the TRS Numbering Directory, is a central database that maps each user's telephone number to routing information needed to find that user's device on the Internet. The *First Numbering Order* requires VRS and IP Relay providers to collect and maintain the routing information from their registered users and to provision that information to the TRS Numbering Directory so that this mapping can occur.

The Commission is also obligated to promote "safety of life and property"<sup>6</sup> and to "encourage and facilitate the prompt deployment throughout the United States of a seamless, ubiquitous, and reliable end-to-end infrastructure" for public safety.<sup>7</sup> E911 is a critical part of the nation's public safety infrastructure that enables all citizens to reach emergency services directly and efficiently, irrespective of technology.<sup>8</sup> E911 works by routing emergency calls to the appropriate emergency answering authority over a dedicated, redundant, highly-reliable wireline network (the Wireline E911 Network) that is interconnected with but largely separate from the public switched telephone network. E911 relies on Automatic Location Information (ALI) databases.

Because there previously has been no reliable means for VRS and IP Relay providers, unlike wireline carriers, to automatically know the physical location of their users, the *First Numbering Order* requires VRS and IP Relay providers to collect and maintain the Registered Location of their registered users. Furthermore, to ensure that authorities can retrieve a user's Registered Location, along with the provider's name and the TRS communication assistant's (CA's) identification number for callback purposes, the *First Numbering Order* requires VRS and IP Relay providers to provision that information into, or make that information available through, ALI databases across the country.

To ensure that Internet-based TRS users are aware of their providers' numbering and E911 service obligations and to inform them of their providers' E911 capabilities, the *First Numbering Order* requires VRS and IP Relay providers to post an advisory on their websites and in any promotional materials addressing numbering or E911 services for VRS or IP Relay and to obtain and keep a record of affirmative acknowledgement from each of their registered users of having received and understood the user notification.

These information collection requirements are described further below.<sup>9</sup>

### **Second Numbering Order**

On December 19, 2008, the Commission adopted the *Second Numbering Order* (FCC 08-275), further addressing the duties of VRS and IP Relay providers to supply numbering and E911

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<sup>6</sup> See 47 U.S.C. § 151.

<sup>7</sup> Wireless Communications and Public Safety Act of 1999 (911 Act), Pub. L. No. 106-81, 113 Stat. 1286, § 2(b).

<sup>8</sup> See 911 Act, § 3; 47 U.S.C. §§ 251(e)(3), 615.

<sup>9</sup> Information collections associated with the rules adopted in the *First Numbering Order* were initially approved by OMB on November 14, 2008. 73 FR 70905 (Nov. 24, 2008) (also announcing effective date of 47 CFR §§ 64.605(a) and (b), and 64.611(a), (b), (c) and (f)).

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capabilities to their users, as established in the *First Numbering Order*. The *Second Numbering Order* revised the “User Notification” information collection requirement adopted in the *First Numbering Order*. The *Second Numbering Order* also requires VRS and IP Relay providers to ascertain the registration status of users who may be registered with another provider, and verify the accuracy of user registration information and obtain a self-certification about the user’s disability. In addition, VRS providers must obtain Commission approval to pass through certain numbering-related costs to its users, and ensure the equipment they provide to users will enable another VRS provider to perform all of the functions of a default provider.

These information collection requirements are described further below.<sup>10</sup>

### **iTRS Toll Free Order**

On August 4, 2011, the Commission adopted the *iTRS Toll Free Order* (FCC 11-123). The Commission took steps to improve the assignment of telephone numbers associated with iTRS, specifically, VRS and IP Relay. The *iTRS Toll Free Order* revised the requirement for VRS and IP Relay providers to collect and maintain the routing information from their registered users and to provision that information to the TRS Numbering Directory that was adopted in the *First Numbering Order*. The *iTRS Toll Free Order* also further revised the “User Notification” information collection requirements that were established by the *First Numbering Order* and revised by the *Second Numbering Order*. These information collection requirements are described further below.<sup>11</sup>

### **Information Collection Requirements:**

The rules adopted in the *First Numbering Order*, the *Second Numbering Order*, and the *iTRS Toll Free Order* have the following information collection requirements:

(A) *Routing Information*. VRS and IP Relay providers must obtain current routing information, including IP addresses or domain names and user names, from their registered users and must maintain such information in their internal databases.

(B) *Provision of Routing Information*. VRS and IP Relay providers must provision their registered users’ routing information to the TRS Numbering Directory and must maintain such information in that database.<sup>12</sup> In addition to provisioning their registered users’ routing information to the TRS Numbering Directory and maintaining such information in the database, VRS and IP relay providers must ensure that the toll free number of a user that is associated with a geographically appropriate

<sup>10</sup> Information collections associated with the rules adopted in the *Second Numbering Order* were initially approved by OMB on November 23, 2009. 75 FR 29914 (May 28, 2010) (also announcing effective date of 47 CFR § 64.605, as amended).

<sup>11</sup> Information collections associated with the rules adopted in the *iTRS Toll Free Order* were initially approved by OMB on September 27, 2011. 76 FR 72124 (Nov. 22, 2011) (also announcing effective date of 47 CFR §§ 64.611(e)(2), 64.611(e)(3), 64.611(g)(1)(v), 64.611(g)(1)(vi), and 64.613(a)(3), as amended).

<sup>12</sup> This requirement was established by the *First Numbering Order*.

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NANP number will be associated with the same Uniform Resource Identifier (URI) as that geographically appropriate NANP telephone number.<sup>13</sup>

(C) *Registered Location.* VRS and IP Relay providers must obtain from each newly registered user, prior to the initiation of service, the physical location at which the service will be utilized and keep that information in their own databases. If the VRS or IP Relay is capable of being used from more than one location, the providers must offer their registered users one or more methods of updating their physical location, including at least one option that requires use of only the customer premises equipment necessary to access the VRS or IP Relay. Any method utilized must allow a registered user to update his or her Registered Location at will and in a timely manner.<sup>14</sup>

(D) *Provision of Registered Location.* Each VRS and IP Relay provider must place its registered users' Registered Location, the provider's name, and the CA's identification number into, or make that information available through, ALI databases across the country.<sup>15</sup>

(E) *User Notification.* Every VRS or IP Relay provider must include an advisory on its website and in any promotional materials addressing numbering or E911 services for VRS or IP Relay. At a minimum, the advisory must address the following issues: (i) the process by which VRS or IP Relay users may obtain ten-digit telephone numbers, including a brief summary of the numbering assignment and administration processes; (ii) the portability of ten-digit telephone numbers assigned to VRS or IP Relay users; (iii) the process by which persons using VRS or IP Relay may submit, update, and confirm receipt by the provider of their Registered Location information; and (iv) an explanation emphasizing the importance of maintaining accurate, up-to-date Registered Location information with the user's default provider in the event that the individual places an emergency call via an Internet-based relay service.<sup>16</sup> In addition, the consumer advisories must explain that: (1) the consumer may obtain a telephone number from, and register with, his or her provider of choice; (2) the consumer may change default providers while retaining the same telephone number by porting that number to the new default provider; (3) the consumer may make calls through, and receive calls from, any provider; and (4) the provider cannot condition the ongoing use or possession of equipment, or the receipt of different or upgraded equipment, on the consumer continuing to use the provider as his or her default provider.<sup>17</sup> The consumer advisories must further explain: (1) the process by which a VRS or IP Relay user may acquire a toll free number from a toll free service provider, including contact information for toll free service providers, or transfer control of a toll free number from a VRS or IP Relay provider to the user; and (2) the process by which persons holding a

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<sup>13</sup> This requirement was added by the *iTRS Toll Free Order*.

<sup>14</sup> These requirements were established by the *First Numbering Order*. In addition, each VRS provider must submit the user's Registered Location and other user-related information to the TRS User Registration Database (TRS-URD). The information collections and burdens associated with these requirements are included in OMB Control Number 3060-1201.

<sup>15</sup> This requirement was established by the *First Numbering Order*. ALI databases contain location information that is associated with calling numbers that is used to route emergency calls appropriately.

<sup>16</sup> These requirements were established by the *First Numbering Order*.

<sup>17</sup> This requirement was added by the *Second Numbering Order*.

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toll free number may have that number linked to their ten-digit telephone number in the TRS Numbering Directory.<sup>18</sup>

(F) *Affirmative Acknowledgements*. VRS and IP Relay providers must obtain and keep a record of affirmative acknowledgement from each of their registered users of having received and understood the user notification.<sup>19</sup>

(G) *Ascertaining Registration Status of VRS or IP Relay User*. Every VRS and IP Relay provider must verify whether a dial-around user is registered with another provider.<sup>20</sup> The provider may do so by requesting a user's ten-digit NANP number and querying the TRS Numbering Directory using that number.

(H) *Verifying Registration and Eligibility Information*. Every VRS and IP Relay provider must institute procedures to verify the accuracy of registration information, including the consumer's name and mailing address, and include a self-certification component requiring consumers to verify that they have a medically recognized hearing or speech disability necessitating their use of TRS.<sup>21</sup>

(I) *Commission Approval for the Pass Through of Numbering Costs*. Each VRS or IP Relay provider wishing to pass through certain numbering-related costs to its users must obtain Commission approval to do so.<sup>22</sup>

(J) *Information Sharing After a Change in Default Providers*. Each VRS provider that provisions equipment to a consumer must make available to other VRS providers enough information about that

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<sup>18</sup> This requirement was added by the *iTRS Toll Free Order*.

<sup>19</sup> This requirement was established by the *First Numbering Order*.

<sup>20</sup> This requirement was established by the *Second Numbering Order*. A "dial-around" user is one who selects and registers with a provider, which serves as the user's default provider for the user's ten-digit NANP number, but who chooses to place a call through another provider. Because there is only one IP Relay provider certified by the Commission, this requirement does not apply to IP Relay at this time and for the foreseeable future.

<sup>21</sup> These requirements were established by the *Second Numbering Order*. In addition to these requirements, each VRS provider must certify the eligibility of VRS users by first obtaining written certification from the user containing specific attestations on a separate form, and must submit such certification for existing users and transferred users to the TRS-URD. The certification of eligibility must contain user's attestation that: (1) the user has a hearing or speech disability; and (2) the user understands that the cost of VRS calls is paid for by contributions from other telecommunications users to the TRS Fund. Once the TRS-URD Database is fully implemented, responsibility for verification of registration and eligibility information of VRS users will shift to the TRS-URD administrator. The information collections and burdens associated with these requirements are included in OMB Control Number 3060-1201.

<sup>22</sup> This requirement was established by the *Second Numbering Order*. VRS and IP Relay providers may pass through certain costs to their registered users, costs which typically are borne by consumers of voice communication services and are not compensable from the Interstate TRS Fund. These costs include: (1) costs associated with an Internet-based TRS consumer's acquisition of a ten-digit geographic telephone number (pass through of this cost is subject to Commission approval); (2) costs associated with an Internet-based TRS consumer's acquisition and usage of a toll free telephone number; and (3) any E911 charges that may be imposed on Interstate TRS providers under a state or local E911 funding mechanism.

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equipment to enable another VRS provider selected as the consumer's default provider to perform all of the functions of a default provider.<sup>23</sup>

This information collection requires the collection of personally identifiable information (PII) on individuals, however, a third party, the individual's VRS or IP Relay provider, collects the PII and the Commission has no direct involvement in this collection.

Statutory authority for this information collection is contained in sections 1, 2, 4(i), 4(j), 225, 251, 255, and 303(r) of the Communications Act of 1934, as amended, 47 U.S.C. §§ 151, 152, 154(i), 154(j), 225, 251, 255, 303(r).

2. The responses listed below address how, by whom, and the purpose of the information collection requirements adopted in the *First Numbering Order*, *Second Numbering Order*, and the *iTRS Toll Free Order*.

(A) *Routing Information*. Each VRS or IP Relay provider collects its registered users' routing information from their communications devices so that such routing information can be provisioned into the TRS Numbering Directory.

(B) *Provision of Routing Information*. A VRS or IP Relay provider provisions its registered users' routing information into the TRS Numbering Directory, and ensures that that users' toll free numbers are associated with geographically appropriate NANP numbers and their URIs, so that other providers can access that routing information to complete a call to a particular Internet-based TRS user.

(C) *Registered Location*. Each VRS or IP Relay provider collects its registered users' Registered Locations and enables users, including users of mobile devices, to update their Registered Location information using the same device used for VRS or IP Relay and by other methods the provider chooses to offer. VRS and IP Relay providers, along with the entity that operates the Wireline E911 Network and public safety officials, use the Registered Location to deliver 911 calls to the appropriate emergency answering point.

(D) *Provision of Registered Location*. Each VRS or IP Relay provider provisions ALI databases with its registered users' Registered Location information, along with other callback information. The VRS or IP Relay provider, the entity that operates the Wireline E911 Network, and public safety officials can then use this information to facilitate emergency response.

(E) *User Notification*. Every VRS and IP Relay provider must post an advisory on its website and in any promotional materials addressing numbering, toll free numbers, or E911 services for VRS or IP Relay so that customers understand the capabilities, limitations, and obligations of providers, particularly with respect to ten-digit numbering, the ability to make and receive calls through any provider, number portability, how to and the importance of keeping Registered Location information current, and acquiring and using toll free numbers.

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<sup>23</sup> This requirement was established by the *Second Numbering Order*.

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(F) *Affirmative Acknowledgements*. Every VRS or IP Relay provider must obtain and keep a record of affirmative acknowledgement from each of their registered users of having received and understood the user notification to facilitate the Commission's review and, if necessary, enforcement of these rules.

(G) *Ascertaining Registration Status of VRS or IP Relay User*. A VRS or IP Relay provider may request a user's ten-digit NANP number and query the TRS Numbering Directory using that number to distinguish a new user who has not yet registered from a user who is registered with another provider.<sup>24</sup>

(H) *Verifying Registration and Eligibility Information*. Every VRS and IP Relay provider must institute procedures to verify the accuracy of registration information and include a disability self-certification to ensure that their services are not used for fraudulent or other purposes not authorized by the statute or by the Commission's rules.

(I) *Commission Approval for the Pass Through of Numbering Costs*. A VRS or IP Relay provider wishing to pass through certain numbering-related costs to its users must obtain Commission approval to do so the Commission can ensure that only customer-specific, actually incurred costs are passed on to VRS and IP Relay users.

(J) *Information Sharing After a Change in Default Providers*. Every VRS provider that provisions equipment to a consumer must make available to the consumer's newly selected default provider certain information about that equipment. This information will be used by the new default provider to perform the functions required of a default provider, including enabling point-to-point (non-relay) communications between VRS users, when a user switches providers but wishes to use equipment supplied by another default provider.

3. The Commission encourages VRS and IP Relay providers to use information technology to whatever extent possible to reduce the burden of the information collections adopted in the *First Numbering Order*, *Second Numbering Order*, and the *iTRS Toll Free Order*.

(A) *Routing Information*. The Commission expects that a VRS or IP Relay provider's collection of routing information will be automatically done over the Internet.

(B) *Provision of Routing Information*. VRS and IP Relay providers must provision a registered user's updated routing information to the TRS Numbering Directory by electronic means.

(C) *Registered Location*. If a VRS or IP Relay provider's service is capable of being used from more than one location, the provider must offer its registered users one or more methods of updating their Registered Location, including at least one option that requires use only of the customer premises equipment necessary to access the VRS or IP Relay. The Commission expects that many VRS and IP Relay providers will also allow their registered users to update their Registered Location via a webpage.

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<sup>24</sup> Because there is only one IP Relay provider certified by the Commission, this requirement does not apply to IP Relay at this time and for the foreseeable future.

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(D) *Provision of Registered Location.* VRS and IP Relay providers must use electronic means to provide information in or through ALI databases.

(E) *User Notification.* Every VRS and IP Relay provider must disseminate the required advisory by electronic means, i.e., on its website. Providers must also include the advisory whenever they disseminate promotional materials addressing numbering, toll free numbers, or E911 services for VRS or IP Relay using whatever method they choose, electronic or otherwise.<sup>25</sup>

(F) *Affirmative Acknowledgements.* Affirmative acknowledgements from registered users of having received and understood the user notification can be obtained and stored electronically, e.g., through a VRS or IP Relay provider's website and in an electronic database.

(G) *Ascertaining Registration Status of VRS or IP Relay User.* VRS and IP Relay providers must use electronic means to query the Numbering Directory using a VRS or IP Relay user's ten-digit number in order to determine whether a user is registered with another provider.<sup>26</sup>

(H) *Verifying Registration and Eligibility Information.* VRS and IP Relay providers may use electronic means to verify the accuracy of registration information and to allow a consumer to certify that he or she has a medically recognized hearing or speech disability necessitating his or her use of TRS.

(I) *Commission Approval for the Pass Through of Numbering Costs.* VRS and IP Relay providers may submit to the Commission in electronic format a request to pass through certain numbering-related costs to their users.

(J) *Information Sharing After a Change in Default Providers.* A VRS provider that provisions equipment to a consumer can make available to a newly selected default provider, in an electronic format, certain information about that equipment.

4. None of the information collected as a result of the *First Numbering Order*, the *Second Numbering Order*, or the *iTRS Toll Free Order* is duplicative of other information. The Commission has also taken the affirmative step of requiring VRS and IP Relay providers to cease acquiring routing information from any registered user that ports his or her number to another VRS or IP Relay provider.
5. In the *First Numbering Order*, *Second Numbering Order*, and the *iTRS Toll Free Order*, the Commission has attempted to balance the economic interests of small businesses with the significant public interest in access to numbering, toll free numbers, and E911 services when using VRS and IP Relay, and has taken several steps to minimize the information collection burden for small business concerns, including those with fewer than 25 employees.

<sup>25</sup> These means of disseminating consumer advisory information were not altered by the revisions made to the "User Notification" requirement in the *Second Numbering Order* or in the *iTRS Toll Free Order*.

<sup>26</sup> Because there is only one IP Relay provider certified by the Commission, this requirement does not apply to IP Relay at this time and for the foreseeable future.



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(A) *Routing Information*. In requiring that VRS and IP Relay providers obtain routing information for their registered users, the *First Numbering Order* requires that providers that have issued, leased, or otherwise provided customer premises equipment (usually larger providers) must ensure that such equipment delivers routing information to each user's default provider.

(B) *Provision of Routing Information*. Once a provider has automatically received that information, it can provision the TRS Numbering Directory with that information electronically.

(C) *Registered Location*. In requiring that VRS and IP Relay providers obtain their registered users' Registered Location, the *First Numbering Order* allows providers to comply with this requirement directly or by utilizing the services of a third party.

(D) *Provision of Registered Location*. In requiring that VRS and IP Relay providers provision Registered Location information along with callback information to public safety officials through ALI databases, the *First Numbering Order* allows providers to comply with this requirement directly or by utilizing the services of a third party.

(E) *User Notification*. In requiring VRS and IP Relay providers to provide their users with an advisory about numbering, toll free numbers, and E911 services, the *First Numbering Order*, *Second Numbering Order*, and *iTRS Toll Free Order* only require posting on provider websites and in any promotional materials addressing those services.

(F) *Affirmative Acknowledgements*. Affirmative acknowledgements from registered users of having received and understood the user notification can be obtained and stored electronically. The Commission believes that these requirements should entail minimal burden on small entities.

(G) *Ascertaining Registration Status of VRS or IP Relay User*. To the extent that VRS and IP Relay providers will use electronic means to query the Numbering Directory using a VRS or IP Relay user's ten-digit number, the Commission believes that this requirement should entail minimal burden on small entities.<sup>27</sup>

(H) *Verifying Registration and Eligibility Information*. The *Second Numbering Order* does not mandate the use of specific verification procedures and requires only that providers implement a reasonable means of verifying registration and eligibility information that is not unduly burdensome to the consumer. Allowing VRS and IP Relay providers to establish their own verification procedures should minimize the burden on small entities.<sup>28</sup>

(I) *Commission Approval for the Pass Through of Numbering Costs*. The *Second Numbering Order* allows VRS and IP Relay providers to submit to the Commission in electronic format any request to

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<sup>27</sup> Because there is only one IP Relay provider certified by the Commission, this requirement does not apply to IP Relay at this time and for the foreseeable future.

<sup>28</sup> Once the TRS-URD Database is fully implemented, responsibility for verification of registration and eligibility information of VRS users will shift to the TRS-URD administrator, thereby further reducing the burden for small business concerns. The information collections and burdens associated with these requirements are included in OMB Control Number 3060-1201.

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pass through certain numbering-related costs to users, which should minimize any burden on small entities.

(J) *Information Sharing After a Change in Default Providers.* A VRS provider that provisions equipment to a consumer can make available to a newly selected default provider, in an electronic format, the information about that equipment that is required by the *Second Numbering Order*. This requirement should reduce the burden on small entities that are selected to be the default provider of a consumer who previously received equipment from another provider.

We also note the following with respect to minimizing the impact on small businesses of the information collections adopted in the *First Numbering Order*, *Second Numbering Order*, and *iTRS Toll Free Order*. First, VRS and IP Relay providers, large and small, have successfully completed the transition by implementing all of the numbering and E911 requirements, including the information collections contained therein. Second, these providers have successfully completed the transition by implementing all of the toll free number requirements, including the information collections contained therein. Third, the Commission has authorized the Interstate TRS Fund to include the reasonable costs of complying with the numbering and E911 requirements of the *First Numbering Order* and *Second Numbering Order* as part of the rate setting methodology, which has and should continue to substantially alleviate any burdens on small businesses, including those with fewer than 25 employees.

6. *First Numbering Order.* If a VRS or IP Relay provider did not collect a registered user's routing information whenever that information changed, or did not provision any updated routing information to the TRS Numbering Directory, individuals and businesses trying to contact that registered user using his or her telephone number would be unable to complete the call. Further, if the contacting entity were a public safety official trying to reestablish contact after an interrupted call, less frequent information collection could hamper and threaten the integrity of a public safety response.

If a VRS or IP Relay provider did not collect a registered user's Registered Location whenever that user sought to change it or did not provision a registered user's Registered Location and other callback information through the ALI databases as needed, emergency calls could be routed to geographically inappropriate emergency authorities, and public safety officials would lose some of the benefits of E911 service.

Posting a consumer advisory on a VRS or IP Relay provider's website is a one-time collection and users may not realize the capabilities and obligations of those providers absent such an advisory. Requiring the inclusion of an advisory whenever a VRS or IP Relay provider disseminates promotional materials regarding numbering or E911 services helps ensure that every user who may rely on those services will know the provider's capabilities and obligations.

The affirmative acknowledgements by registered users of having received the consumer advisory is a one-time collection. Without it, the Commission's ability to review and enforce its advisory requirements would be hampered.

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*Second Numbering Order.* The requirement that VRS and IP Relay providers ascertain the registration status of VRS and IP Relay users encourages users to register with a default provider. Without such a requirement, fewer users may undertake the registration process. An emergency VRS or IP Relay call placed by an unregistered user could be routed to geographically inappropriate emergency authorities and emergency personnel may lack information needed to ascertain the location of the emergency.

Requiring VRS and IP Relay providers to verify registration and eligibility information helps to reduce the fraudulent use of these services. Absent this requirement, the use of VRS and IP Relay by individuals or entities not authorized to use these services would likely increase.<sup>29</sup>

VRS and IP Relay providers must obtain Commission approval to pass through certain numbering-related costs to their users. Absent this requirement, users might be charged costs exceeding those that the Commission has determined may be passed on to the user.

When a VRS consumer switches default providers, a VRS provider that has issued equipment to a consumer must make available to the consumer's newly selected default provider certain information about the equipment. Absent this requirement, provider-supplied equipment may not operate properly, or at all, following the change of default providers.

*iTRS Toll Free Order.* Including information regarding toll free numbers in the consumer advisory on the VRS and IP Relay provider's website will help users obtain a toll free number from an independent toll free service provider.

7. A VRS or IP Relay provider may retain the affirmative acknowledgements by registered users of having received and understood the required consumer advisory for more than three years to the extent users remain registered with that provider for more than three years.
8. The Commission placed a 60-day notice in the *Federal Register*, as required by 5 CFR § 1320.8(d), seeking comments from the public on this information collection prior to submission to OMB. See 82 FR 10576, published on February 14, 2017. No comments were received.
9. No payments or gifts will be provided to respondents, other than the cost recovery regime established pursuant to Section 225 of the Communications Act of 1934, as amended, whereby the Interstate TRS Fund compensates TRS providers for the reasonable costs of providing service in compliance with TRS regulations, including those adopted in the *First Numbering Order*, *Second Numbering Order*, and the *iTRS Toll Free Order*.<sup>30</sup>
10. The Commission has taken several steps to specifically protect registered users' routing information and the provision of that information to the TRS Numbering Directory. First, VRS and IP Relay providers "must ensure that all [equipment] they have issued . . . to VRS or IP Relay users delivers

<sup>29</sup> As discussed above, once the TRS-URD Database is fully implemented, responsibility for verification of registration and eligibility information of VRS users will shift to the TRS-URD administrator. The information collections and burdens associated with these requirements are included in OMB Control Number 3060-1201.

<sup>30</sup> 47 U.S.C. § 225(d)(3); 47 CFR § 64.604(c)(5).

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routing information or other information *only* to the user’s default provider, except as is necessary to complete or receive ‘dial around’ calls on a case-by-case basis.”<sup>31</sup> Second, VRS and IP Relay providers must “[t]ake such steps as are necessary to cease acquiring routing information from any VRS or IP Relay user that ports his or her number to another VRS or IP Relay provider or otherwise selects a new default provider”<sup>32</sup> and they must stop provisioning that information to the TRS Numbering Directory.<sup>33</sup> Third, access to the routing information in the TRS Numbering Directory is limited to VRS and IP Relay providers and an administrator.<sup>34</sup>

The Commission also requires VRS and IP Relay providers to ensure that obtaining a registered user’s Registered Location and provisioning that information along with callback information into or through ALI databases “is limited to that needed to facilitate 911 services, is made available only to emergency call handlers and emergency response or law enforcement personnel, and is used for the sole purpose of ascertaining a user’s location in an emergency situation or for other emergency or law enforcement purposes.”<sup>35</sup>

The *Second Numbering Order* also prohibits the unauthorized disclosure of a VRS or IP Relay user’s personal information.<sup>36</sup>

In addition, in 2013, the Commission adopted customer proprietary network information (CPNI) rules for TRS to ensure that the TRS user experiences a service that is functionally equivalent to a voice telephone service, including the privacy protections of the Commission’s CPNI regulations.<sup>37</sup>

This information collection requires the collection of personally identifiable information (PII) on individuals, however, a third party, the individual’s VRS or IP Relay provider, collects the PII and the Commission has no direct involvement in this collection. As such, the Commission is not required to complete a privacy impact assessment (PIA).<sup>38</sup> Further, VRS and IP Relay providers generally have

<sup>31</sup> 47 CFR § 64.611(f)(1) (emphasis added).

<sup>32</sup> 47 CFR § 64.611(c)(2)(i).

<sup>33</sup> 47 CFR § 64.611(c)(2)(ii)(A).

<sup>34</sup> 47 CFR § 64.613(a)(4).

<sup>35</sup> 47 CFR § 64.605(a)(2)(vi).

<sup>36</sup> See *Second Numbering Order*, 24 FCC Rcd at 824, para. 71.

<sup>37</sup> 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*, Report and Order and Further Notice of Proposed Rulemaking, 28 FCC Rcd 8618 (2013) (*VRS Reform Order*); see also 47 CFR §§ 64.5101-64.5111 (TRS Customer Proprietary Network Information). Information collection burdens associated with TRS CPNI requirements are contained in OMB Control Number 3060-1201.

<sup>38</sup> Currently, VRS and IP Relay providers use their own separate registration and verification systems. Once the TRS-URD Database is fully implemented, responsibility for verification of registration and eligibility information of VRS users will shift to the TRS-URD administrator. *VRS Reform Order*, 28 FCC Rcd at 8647-8656, paras. 62-86. Information collection burdens associated with the TRS-URD, as well as actions taken to address PII privacy issues, are contained in OMB Control Number 3060-1201.

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written privacy policies governing the treatment of information collected from their users, and the Commission expects that much of the information collected here would fall under those policies.

11. This information collection does not address any private matters of a sensitive nature.

**12. Information Collection Requirements:**

Currently, 5 entities provide VRS and 1 entity provides IP Relay service (a total of six 6 providers)<sup>39</sup> to approximately 425,000 VRS users and 30,000 IP Relay users for a total of 455,000 registered users.<sup>40</sup>

The Commission estimates that the 6 providers, collectively, register an average of approximately 30,000 new users every year. The Commission also estimates that approximately 30,000 users relinquish their registrations and ten-digit NANP numbers every year, resulting in no net increase or decrease in the total number of registered users over time.

The Commission assumes that each provider will use in-house personnel whose pay is comparable to administrative level federal employees (GS-7/5), at a rate of \$24.41 per hour, to perform service-related tasks; in-house personnel whose pay is comparable to mid-level federal employees (GS-13/5), at a rate of \$51.48 per hour, to perform tasks involving system development, testing, deployment, and maintenance; and an in-house attorney whose pay is comparable to mid-to-senior-level federal employees (GS-15/5), at a rate of \$71.56 per hour, to perform legal tasks.

The Commission estimates that there are no specific in-house or other annual costs for registered users.

(A) *Routing Information* and (B) *Provision of Routing Information*. Each VRS and IP Relay provider must obtain updated routing information and provision that routing information to the TRS Numbering Directory whenever a registered user's routing information changes. Because these requirements have been in place for several years, there are no current burdens or costs to providers associated with the development, testing, and deployment of these systems. The Commission expects, however, that providers will need to maintain these systems.

The Commission estimates that each of the 6 providers (6 respondents/responses) will spend an average of 250 hours per year (1,500 annual hours) maintaining systems to automatically obtain,

<sup>39</sup> Several VRS and IP Relay providers have exited the market over the last three years. Based on the Commission's experience, it assumes that the number of VRS and IP Relay providers will remain constant (not increase or decrease) for the foreseeable future.

<sup>40</sup> For purposes of this information collection, the term "user" or "registered user" means an individual who has registered with a VRS or IP Relay provider and has been assigned a ten-digit NANP number for VRS or IP Relay services. An individual may register with multiple VRS and IP Relay providers and may be assigned multiple ten-digit NANP numbers for those services. As a result, the number of "users" or "registered users" is greater than the number of unique individuals who register for VRS and IP Relay services. Because these information collections are applied to each registration for and each ten-digit number assigned, the terms "user" and "registered user," as defined herein, more accurately reflects the burdens and costs associated with these information collections.

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retain, and provision routing information from registered users using in-house personnel at a rate of \$51.48 per hour (\$77,220.00 annual cost).

When any of the VRS and IP Relay providers register new users, those new users need to configure their devices to notify their default provider whenever their routing information changes.

The Commission estimates that 6 providers (6 respondents) will register an average of approximately 30,000 new users per year (30,000 responses), each of whom will spend an average of 0.20 hours (12 minutes) to configure or attempt to configure their devices (6,000 annual hours).

VRS and IP relay providers will likely need to follow up with those registered users who are unable to configure their devices for this purpose.

The Commission estimates that each of the 6 providers (6 respondents) will spend an average of 0.30 hours (18 minutes) with 30% of their 30,000 new users (9,000 responses) assisting those new users to configure their devices (2,700 annual hours) using in-house personnel at a rate of \$24.41 per hour (\$65,907.00 annual cost).

Each provider must also ensure that the toll free number of a user that is associated with a geographically appropriate NANP number is associated with the same URI as that geographically appropriate NANP telephone number. Because these requirements have been in place for several years, there are no current burdens or costs to providers associated with the development, testing, and deployment of these systems. The Commission expects, however, that providers will need to maintain these systems.

The Commission estimates that each of the 6 providers (6 respondents/responses) will spend an average of 50 hours per year (300 annual hours) maintaining systems to ensure that the toll free number of a user that is associated with a geographically appropriate NANP number will be associated with the same URI as that geographically appropriate NANP telephone number using in-house personnel at a rate of \$51.48 per hour (\$15,444.00 annual cost).

**Total Number of Respondents: 6 respondents**

**Total Annual Number of Responses: 39,012 responses** (6 + 30,000 + 9,000 + 6)

**Total Annual Hourly Burden: 10,500 hours** (1,500 + 6,000 + 2,700 + 300)

**Total Annual "In-House" Costs: \$158,571.00** (\$77,220.00 + \$65,907.00 + \$15,444.00)

(C) *Registered Location.* VRS and IP Relay providers must obtain and retain a Registered Location for each newly registered user. The Commission expects that approximately 95% of new users will complete this process online, and approximately 5% of new users will complete the process offline, *e.g.*, by contacting a service representative. The Commission assumes that all current VRS and IP Relay providers have deployed a website to collect registration information, Registered Location

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information, and user notification affirmative acknowledgments,<sup>41</sup> and developed a separate tracking system for offline registration. Because these requirements have been in place for several years, there are no current burdens or costs to providers associated with the development, testing, and deployment of these systems. The Commission expects, however, that providers will need to maintain these systems. The Commission also expects that a registered user may, on occasion, need to update his or her Registered Location, and that doing so will require less time because of his or her familiarity with the process.

The Commission estimates that each of the 6 providers (6 respondents/responses) will spend an average of 250 hours per year (1,500 annual hours) maintaining systems associated with online registration services using in-house personnel at a rate of \$51.48 per hour (\$77,220.00 annual cost).<sup>42</sup>

The Commission estimates that 6 providers (6 respondents) will register an average of 30,000 new users per year, 95% of whom (28,500 responses) will spend an average of 0.15 hours (9 minutes) to provide registration information, Registered Location information, and user notification affirmative acknowledgments online (4,275 annual hours).

The Commission estimates that the 6 providers (6 respondents) will spend an average of 0.25 hours (15 minutes) each with 5% of their 30,000 new users (1,500 responses) to collect registration information, Registered Location information, and user notification affirmative acknowledgments offline (375 annual hours) using in-house personnel at a rate of \$24.41 per hour (\$9,153.75 annual cost).

The Commission estimates the 6 providers (6 respondents) will enable all of their registered users to update their Registered Locations and that 20% of all 455,000 registered users (91,000 users) will update their Registered Locations every year. The Commission estimates that 95% of those 91,000 registered users (86,450 responses) will each spend an average of 0.05 hours (3 minutes) to update their Registered Locations online (4,322.50 annual hours).

The Commission estimates that the 6 providers (6 respondents) will spend an average of 0.08 hours (about 5 minutes) each with 5% of the 91,000 users (4,550 responses) who update their Registered Locations offline (364 annual hours) using in-house personnel at a rate of \$24.41 per hour (\$8,885.24 annual cost).

**Total Number of Respondents: 6 respondents**

**Total Annual Number of Responses: 121,006 responses** (6 + 28,500 + 1,500 + 86,450 + 4,550)

**Total Annual Hourly Burden: 10,836.50 hours (10,837 rounded)** (1,500 + 4,275 + 375 + 4,322.50 + 364)

**Total Annual "In-House" Costs: \$95,258.99** (\$77,220.00 + \$9,153.75 + \$8,885.24)

<sup>41</sup> See question 12(F), below.

<sup>42</sup> The Commission assumes that there is no additional burden or cost to providers related to users registering through the provider's online registration system.

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(D) *Provision of Registered Location.* VRS and IP Relay providers must place Registered Location and other callback information into or make that information available through ALI databases each time one of their registered users makes an emergency call. Because these requirements have been in place for several years, there are no current burdens or costs to providers associated with the development, testing, and deployment of these systems. The Commission expects, however, that providers will need to maintain these systems.

The Commission estimates that each of the 6 providers (6 respondents/responses) will spend an average of 250 hours per year (1,500 annual hours) maintaining automated systems for provisioning ALI databases using in-house personnel at a rate of \$51.48 per hour (\$77,220.00 annual cost).

**Total Number of Respondents: 6 respondents**

**Total Annual Number of Responses: 6 responses**

**Total Annual Hourly Burden: 1,500 hours**

**Total Annual “In-House” Costs: \$77,220.00**

(E) *User Notification.* Every VRS or IP Relay provider must include an advisory on its website regarding numbering, E911, toll-free numbers, and related issues, and include the advisory in any promotional materials addressing numbering and E911 services for VRS or IP Relay. Because these requirements have been in place for several years, the Commission assumes that all current VRS and IP Relay providers have complied with this user notification requirement and that there are no current burdens or costs to providers associated with this requirement.<sup>43</sup>

**Total Number of Respondents: None**

**Total Annual Number of Responses: None**

**Total Annual Hourly Burden: None**

**Total Annual “In-House” Costs: None**

(F) *Affirmative Acknowledgements.* VRS and IP Relay providers must obtain and retain a record of affirmative acknowledgement from each of their registered users of having received and understood the user notification. The Commission assumes that current VRS and IP Relay providers have obtained an affirmative acknowledgement from their registered users, and that all providers will obtain such acknowledgements from their new users.<sup>44</sup> The Commission expects that providers will retain all users’ affirmative acknowledgements electronically.

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<sup>43</sup> See note 39, *supra* (noting that the Commission assumes that the number of VRS and IP Relay providers will remain constant for the foreseeable future). The Commission also assumes that maintenance of this information on the providers’ websites is not required because the advisories are static. Further, to the extent that providers incorporate the required advisory into their promotional materials, there should be no annual burden or “in-house” costs to the respondents.



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The Commission estimates that 6 providers (6 respondents) will register an average of 30,000 new users per year, 95% of whom (28,500 responses) will spend an average of 0.05 hours (3 minutes) to read and acknowledge receipt and understanding of the user notification online (1,425 annual hours).

The Commission estimates that the 6 providers (6 respondents) will spend an average of 0.10 hours (6 minutes) each with 5% of the 30,000 new users (1,500 responses) who provide their affirmative acknowledgements offline (150 annual hours) using in-house personnel at a rate of \$24.41 per hour (\$3,661.50 annual cost).

The Commission estimates that each of the 6 providers (6 respondents/responses) will spend an average of 12 hours per year (72 annual hours) overseeing electronic storage of affirmative acknowledgement for registered users using in-house personnel at a rate of \$51.48 per hour (\$3,706.56 annual cost).

**Total Number of Respondents: 6 respondents**

**Total Annual Number of Responses: 30,006 responses** (28,500 + 1,500 + 6)

**Total Annual Hourly Burden: 1,646 hours** (1,424 + 150 + 72)

**Total Annual "In-House" Costs: \$7,368.06** (\$3,661.50 + \$3,706.56)

(G) *Ascertaining Registration Status of VRS or IP Relay User.* When a dial-around call is placed with a VRS or IP Relay provider, the provider must verify that the caller is registered with another provider to ensure that all eligible consumers using VRS or IP Relay are registered with a default provider.<sup>45</sup> The provider may do so by requesting the caller's ten-digit NANP number and querying the TRS Numbering Directory using that number.

The Commission estimates that 50% of all 425,000 registered VRS users (212,500 users) place an average of 15 dial-around calls each per year (3,187,500 dial-around calls).

The Commission estimates that 5 providers (5 respondents) verify that approximately 3,187,500 dial-around calls are made by users registered with another provider (3,187,500 responses), and further estimates that it takes 0.008 hours (about 30 seconds) for a provider to obtain and process a ten-digit NANP number to verify that the user is registered with another provider (25,500 annual hours) using in-house personnel at a rate of \$24.41 per hour (\$622,455.00 annual cost).

**Total Number of Respondents: 5 respondents**

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<sup>44</sup> The burdens and costs associated with maintaining a website to obtain user notification affirmative acknowledgments online, and a tracking system for offline registrations, are included in response to question 12(c), above.

<sup>45</sup> Because there is only one IP Relay provider certified by the Commission, this requirement does not apply to IP Relay at this time and for the foreseeable future.

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**Total Annual Number of Responses: 3,187,500 responses<sup>46</sup>**

**Total Annual Hourly Burden: 25,500 hours**

**Total Annual “In-House” Costs: \$622,455.00**

(H) *Verifying the Accuracy of Registration Information.* Every VRS and IP Relay provider must institute procedures to verify the accuracy of registration information, including the consumer’s name and mailing address, and include a self-certification component requiring consumers to verify that they have a medically recognized hearing or speech disability necessitating their use of TRS.<sup>47</sup> The Commission expects that providers will retain all users’ registration information, including self-certifications, electronically.

The Commission estimates that 6 providers (6 respondents) will register an average of 30,000 new users per year and will spend an average of 0.017 hours (about 1 minute) each with 95% of the 30,000 new users (28,500 responses) to complete the verification and self-certification process online (484.50 annual hours) using in-house personnel at a rate of \$24.41 per hour (\$11,826.65 annual cost).

The Commission estimates that the 6 providers (6 respondents) will spend an average of 0.30 hours (18 minutes) each with 5% of the 30,000 new users (1,500 responses) to complete the verification and self-certification process offline (450 annual hours) using in-house personnel at a rate of \$24.41 per hour (\$10,984.50 annual cost).

**Total Number of Respondents: 6 respondents**

**Total Annual Number of Responses: 30,000 responses (28,500 + 1,500)**

**Total Annual Hourly Burden: 934.50 hours (935 rounded) (484.50 + 450)**

**Total Annual “In-House” Costs: \$22,811.15 (\$11,826.65 + \$10,984.50)**

(I) *Commission Approval for the Pass Through of Numbering Costs.* Each VRS or IP Relay provider wishing to pass through certain numbering-related costs to its users must obtain Commission approval to do so by submitting such a request to the Commission’s Consumer and Governmental Affairs Bureau (CGB).

<sup>46</sup> Previously, the number of responses was inadvertently under-reported. For example, in 2013, the Commission estimated that 217,500 users placed 15 dial-around calls per year (3,262,500 responses), but treated that as the total for all 3 years covered by the information collection, resulting in only 1,087,500 annual responses being reported. See Supporting Statement OMB 3060-1089 (2013).doc and Copy of 3060-1089 appendix B chart 091013.xls, [https://www.reginfo.gov/public/do/PRAViewDocument?ref\\_nbr=201311-3060-019](https://www.reginfo.gov/public/do/PRAViewDocument?ref_nbr=201311-3060-019) (last visited Jan. 25, 2017).

<sup>47</sup> The Commission requires only that Internet-based TRS providers implement a reasonable means of verifying registration and eligibility information that is not unduly burdensome, such as by sending a postcard to the user’s mailing address and instructing the user to return it to the provider, by in-person or on-camera identification checks during registration, or other verification processes similar to those performed by voice telephone providers and other institutions such as banks and credit card companies. *Second Numbering Order*, 24 FCC Rcd at 809, para. 38.

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The Commission estimates that 1 provider will petition CGB each year for approval to pass through numbering-related costs to its users (1 respondent/response),<sup>48</sup> and will spend approximately 16 hours preparing and submitting each petition (16 annual hours) using an in-house attorney at a rate of \$71.56 per hour (\$1,144.96 annual cost).

**Total Number of Respondents: 1**

**Total Annual Number of Responses: 1 response**

**Total Annual Hourly Burden: 16 hours**

**Total Annual “In-House” Costs: \$1,144.96**

(J) *Information Sharing After a Change in Default Providers.* Each VRS provider that provisions equipment to a consumer must make available to other VRS providers enough information about that equipment to enable another VRS provider selected as the consumer’s default provider to perform all of the functions of a default provider. This requirement encompasses two separate burdens: (1) development work by VRS providers’ in-house software developers, in conjunction with in-house software developers of other default VRS providers, to devise a technical solution that will ensure the proper functioning of equipment after a user changes default providers but retains the same equipment; and (2) the exchange of technical information between providers’ service representatives to apply this solution when a user seeks to change default providers and retains equipment issued by a former default provider. The Commission assumes that all current VRS providers have devised technical solutions to ensure the proper functioning of equipment when a user changes default providers, but that VRS providers may need to do so and exchange technical information when introducing new equipment.<sup>49</sup>

(1) The Commission estimates that 5 VRS providers (5 respondents/responses) will spend an average of 25 hours each per year (125 annual hours) to develop software for new equipment to share information with new default providers, using in-house personnel at a rate of \$51.48 per hour (\$6,435.00 annual cost).

(2) The Commission estimates that approximately 10% of 425,000 registered VRS users (42,500 responses) will change default providers each year and further estimates that 5 VRS providers (5 respondents) will spend an average of .03 hours (about 2 minutes) per user (1,275 annual hours) to exchange equipment information using in-house personnel at a rate of \$24.41 per hour (\$31,122.75 annual cost).

**Total Number of Respondents: 5**

**Total Annual Number of Responses: 42,505 responses (5 + 42,500)**

<sup>48</sup> To date, no provider has submitted a petition to pass through numbering-related costs to its users.

<sup>49</sup> See note 39, *supra* (noting that the Commission assumes that the number of VRS and IP Relay providers will remain constant for the foreseeable future).

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**Total Annual Hourly Burden: 1,400 hours** (125 + 1,275)

**Total Annual “In-House” Costs: \$37,557.75** (\$6,435.00 + \$31,122.75)

**CUMULATIVE TOTALS**

**Total Number of Respondents: 6**

**Total Annual Number of Responses: 3,450,036 responses**

**Total Annual Hourly Burden: 52,334 hours**

**Total Annual “In-House” Costs: \$1,022,386.91<sup>50</sup>**

	Respondents	Responses	Hourly Burden	“In-House” Costs
(A) Routing Information and (B) Provision of Routing Information.	6	39,012	10,500	\$158,571.00
(C) Registered Location.	6	121,006	10,837	\$95,258.99
(D) Provision of Registered Location.	6	6	1,500	\$77,220.00
(E) User Notification.	0	0	0	0
(F) Affirmative Acknowledgements.	6	30,006	1,646	\$7,368.06
(G) Ascertaining Registration Status of VRS or IP Relay User.	5	3,187,500	25,500	\$622,455
(H) Verifying the Accuracy of Registration Information.	6	30,000	935	\$22,811.15
(I) Commission Approval for the Pass Through of Numbering Costs.	1	1	16	\$1,144.96
(J) Information Sharing After a Change in Default Providers.	5	42,505	1,400	\$37,557.75
Cumulative Totals	6	3,450,036	52,334	\$1,022,386.91

<sup>50</sup> Because the Commission has authorized the Interstate TRS Fund to reimburse VRS and IP Relay providers for the actual reasonable costs of complying with most of the requirements adopted in the *First Numbering Order*, *Second Numbering Order*, and *iTRS Toll Free Order*, we expect most of the burden of these information collections will fall not on providers but on the TRS Fund.

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13. Estimate of the total annual cost burden to the respondents resulting from the collection of information (excluding the value of the burden hours in question 12, above):

*First Numbering Order.* The Commission estimates that the 6 VRS and IP Relay providers will need to spend \$2,600.00 each (**\$15,600.00** per year) for additional server space, memory, communications, and backup/recovery service associated with routing systems; \$2,600.00 each (**\$15,600.00** per year) for additional server space, memory, communications, and backup/recovery service associated with registration systems; **\$1,940,000.00**<sup>51</sup> per year for dedicated lines between gateway routers and specialized routers associated with provisioning information to the ALI databases; and \$.50 for each of the 455,000 registered users (**\$227,500.00** per year) for access to the Wireline E911 Network for provisioning information to the ALI databases.

*Second Numbering Order.* In the *Second Numbering Order*, the Commission requires VRS and IP relay providers to obtain certifications of eligibility from users and to verify the accuracy of user registration information. To the extent that the certifications or verifications are completed in paper form, the Commission estimates that providers will retain them electronically.

*iTRS Toll Free Order.* In the *iTRS Toll Free Order*, the Commission requires VRS and IP relay providers ensure that the toll free number of a user that is associated with a geographically appropriate NANP number will be associated with the same URI as that geographically appropriate NANP telephone number. The Commission expects these 6 providers to spend \$1,250.00 each (**\$7,500.00** per year) for additional server space, memory, communications, and backup/recovery service associated with these requirements.

**Total annualized capital/start-up cost: None**<sup>52</sup>

**Total annual costs (operation and maintenance): \$2,206,200.00**<sup>53</sup> (\$15,600.00 + \$15,600.00 + \$1,940,000.00 + \$227,500.00 + \$7,500.00)

**Total annual cost requested: \$2,206,200.00**

14. Estimates of annualized costs to the Federal government:

<sup>51</sup> (75 systems to connect to the same city x \$4,200.00 each) + (125 systems to connect to a new city x \$13,000.00 each) = \$1,940,000.00.

<sup>52</sup> In 2008, the Commission reported that the only capital expenditure not covered under question 12 was the cost of gateway routers used to translate VRS and IP Relay calls into traditional analog formats for provisioning the ALI databases, which the Commission estimated would cost the industry \$10,500,000.00, amortized over a period of 5 years, or \$2,100,000.00 per year. The Commission is no longer including the \$2,100,000.00 per year capital expenditure because more than 5 years has passed.

<sup>53</sup> Because the Commission has authorized the Interstate TRS Fund to reimburse VRS and IP Relay providers for the actual reasonable costs of complying with most of the requirements adopted in the *First Numbering Order*, *Second Numbering Order*, and the *iTRS Toll Free Order*, we expect much of the burden of these information collections will fall not on providers, but on the TRS Fund.

Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities; E911 Requirements for IP-Enabled Service Providers; Internet-Based Telecommunications Relay Service Numbering, CG Docket No. 03-123, WC Docket No. 05-196, and WC Docket No. 10-191; FCC 08-151, FCC 08-275, FCC 11-123

The Commission estimates that 1 provider will petition each year for approval to pass through numbering-related costs to its users.<sup>54</sup> The Commission assumes that review and evaluation by a Federal employee (staff attorney) will take approximately 20 hours per filing at \$71.56 per hour.

1 petition x 20 hours x \$71.56 per hour = \$1,431.20 annual cost

None of the remaining information collection requirements in the *First Numbering Order*, *Second Numbering Orders*, or *iTRS Toll Free Order* involve information that will be directly reported to or reviewed by the Commission.

**Total Cost to Federal Government: \$1,431.20**

15. The Commission has the following program changes to this collection which are due to existing respondents having met the one-time *User Notification requirement* that has been in place for several years (**-8 responses and -2,080 annual burden hours**), and because the Commission did not previously address or assess burdens associated with the development and introduction of new equipment in the *Information Sharing After a Change in Default Providers requirement* (**+5 responses and +125 annual burden hours**), the Commission has reevaluated the information collection requirements burdens previously reported in this collection and makes the following program changes:

(a) The Commission's estimate for number of responses has decreased by **-3**, from 2,495,002 to 2,494,999 responses;

(b) The Commission's estimate for the total annual burden hours has decreased by **-1,955**, from 99,221 hours to 97,266 hours.

Furthermore, the Commission has the following adjustments to this collection which are due to several VRS and IP Relay providers exited the market and based on its experience with and the usage of VRS and IP Relay services, the Commission has re-estimated the remaining burdens to reflect any changes that may have occurred since the last time this information collection was reviewed and approved by OMB, and makes the following adjustments:

(a) The Commission's estimate for the number of respondents has decreased by **-2**, from 8 to 6 respondents;

(b) The Commission's estimate for number of responses has increased by **+955,037**, from 2,494,999 to 3,450,036 responses;

(c) The Commission's estimate for the total annual burden hours has decreased by

<sup>54</sup> In-house costs to VRS and IP Relay providers associated with the preparation and submission of petitions to the Commission are included in question 12(I), above.

Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities; E911 Requirements for IP-Enabled Service Providers; Internet-Based Telecommunications Relay Service Numbering, CG Docket No. 03-123, WC Docket No. 05-196, and WC Docket No. 10-191; FCC 08-151, FCC 08-275, FCC 11-123

**-44,932**, from 97,266 hours to 52,334 hours; and

(d) The Commission estimate for the total annual cost has decreased by **-\$2,062,935**, from \$4,269,135 to \$2,206,200

16. The information collected will not be published for statistical use.
17. The information collection does not include any Commission forms; consequently, the Commission has no reason to seek approval to avoid displaying the expiration date for OMB approval of the information collection.
18. There are no exceptions to the Certification Statement.

**B. Collections of Information Employing Statistical Methods**

The information collections do not employ any statistical methods.