

SUPPORTING STATEMENT

A. Justification

1. On March 23, 2017, the Commission adopted *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, Notice of Inquiry, Further Notice of Proposed Rulemaking, and Order, 32 FCC Rcd 2436 (2017) (*2017 VRS Improvements Order*). The purpose of this Paperwork Reduction Act (PRA) submission is to add the collections adopted in the *2017 VRS Improvements Order* for the Internet-based Telecommunication Relay Services (TRS) user registration rules and update the estimates of existing burdens that were included in the August 2014 PRA submission to Office of Management and Budget (OMB) concerning the Internet-based TRS user registration rules.

History:

Title IV of the Americans with Disabilities Act of 1990 (ADA), adding section 225 to the Communications Act of 1934, as amended (Act), requires that:

- (a) The Commission ensures that telecommunications relay service (TRS)¹ is available, to the extent possible and in the most efficient manner, to persons with hearing or speech disabilities in the United States;² and
- (b) TRS offers individuals who are deaf, hard of hearing, deaf-blind, or have speech disabilities telephone transmission services that are “functionally equivalent” to voice telephone services.³

In March 2000, the Commission recognized Video Relay Service (VRS) as a form of TRS. VRS requires the use of a broadband Internet connection between the VRS user and the communication assistant (CA), which allows the VRS user and the CA to communicate in sign language via the video link. During the call, the CA communicates in American Sign Language (ASL) with the VRS user and by voice with the other party. As a result, the conversation between the two parties takes place in near real time.⁴

In April 2002, the Commission also recognized Internet Protocol Relay (IP Relay) service as a form of TRS. IP Relay permits an individual with a hearing or speech disability to communicate in text using an Internet Protocol-enabled device via the Internet, rather than using a text telephone (TTY) and the public switched telephone network (PSTN).⁵

¹ TRS is a telephone transmission service that provides that ability for an individual who is deaf, hard of hearing, deaf-blind, or who has a speech disability to engage in communications by wire or radio with one or more individuals, in a manner that is functionally equivalent to the ability of a hearing individual who does not have a speech disability to communicate using voice communication services by wire or radio. 47 U.S.C. § 225(a)(3). TRS facilities are staffed by communications assistants (CAs) who transliterate or interpret conversations between two or more end users of TRS. 47 CFR § 64.604(a)(10).

² 47 U.S.C. § 225(b)(1).

³ 47 U.S.C. § 225(a)(3).

⁴ *Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities*, Report and Order and Further Notice of Proposed Rulemaking, 15 FCC Rcd 5140 (2000).

⁵ *Provision of Improved Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities; Petition for Clarification of WorldCom, Inc.*, Declaratory Ruling and Second Further Notice of Proposed Rulemaking, 17 FCC Rcd 7779 (2002).

In January 2007, the Commission added Internet Protocol Captioned Telephone Relay (IP CTS) as a form of Internet-based TRS service eligible for compensation from the Interstate TRS Fund. IP CTS is a form of captioned telephone relay service where the connection carrying the captions between the relay provider and the user is via the Internet, rather than the PSTN.⁶

In July 2011, the Commission adopted a new certification process for Internet-based TRS (iTRS) providers to ensure that iTRS providers receiving certification are qualified to provide iTRS in compliance with the Commission's rules, and to eliminate waste, fraud, and abuse through improved oversight of such providers.⁷

On June 10, 2013, the Commission released the *2013 VRS Reform Order*,⁸ adopting further measures to improve the structure, efficiency, and quality of the VRS program, reducing the noted inefficiencies in the program, as well as reducing the risk of waste, fraud, and abuse, and ensuring that the program makes full use of advances in commercially-available technology. Among the measures adopted were the following information collection requirements:

- (a) Each VRS provider must report to the Commission or the TRS Fund administrator false or unverified claims for TRS Fund compensation and unauthorized or unnecessary use of VRS.
- (b) Each VRS CA Service provider shall describe, in its application for certification, how it provides connectivity and route calls to the Neutral Video Communication Service Platform. This platform is not in use at this time.
- (c) Each VRS provider shall include within its annual report a compliance plan describing its policies, procedures, and practices for complying with the requirements of preventing and reporting unauthorized and unnecessary use of VRS.
- (d) If, at any time, the Commission determines that a VRS provider's compliance plan is inadequate to prevent waste, fraud, and abuse of the TRS Fund, the Commission shall so notify the provider and direct the provider to submit an amended compliance plan.
- (e) Each VRS provider must certify the eligibility of each VRS user by obtaining a written certification of eligibility from the user and submitting such certification to the TRS User Registration Database (TRS-URD).
- (f) Each VRS provider shall collect and submit registration information for each TRS user to the TRS-URD. Each VRS provider must explain clearly to each user the TRS-URD, collect consent from each user to transmit the user's information to the TRS-URD, and keep a record of such consent. Each VRS provider is required to maintain the confidentiality of any registration and certification information obtained by the provider under sections (D) and (E) herein; and may not disclose such registration and certification information or the content of such registration and certification information except as required by law or regulation.

⁶ *Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities; Internet-based Captioned Telephone Service*, Declaratory Ruling, 22 FCC Rcd 379 (2007).

⁷ *Structure and Practices of the Video Relay Service Program*, Second Report and Order, 26 FCC Rcd 10898 (2011).

⁸ *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) (*2013 VRS Reform Order*).

- (g) Each VRS provider is required to validate the eligibility of the party on the video side of each call by querying the TRS-URD on a per-call basis through a unique user identifier assigned by the administrator of the TRS-URD.
- (h) Each VRS provider shall request that the administrator of the TRS-URD remove from the TRS-URD user information for any registered user who no longer wants, or is no longer eligible to use a ten-digit number for TRS services. The administrator of the TRS-URD shall remove the data of these users, and of any user that has neither placed nor received a VRS or point-to-point call in a one-year period.
- (i) The administrator of the TRS-URD shall assign a unique identifier to each user in the TRS-URD.
- (j) Prior to changing a user's default iTRS provider, the new provider must obtain authorization from the iTRS user and verify the user's authorization.
- (k) The authorization of change of default provider must be maintained and preserved by the new provider for a minimum period of five years and must be available to the Commission upon request.
- (l) Acquiring iTRS providers must send advance notice to each affected iTRS user of the transfer or sale of iTRS users. All iTRS users receiving the notice will be transferred to the acquiring iTRS provider, unless they have selected a different default provider before the transfer date.
- (m) Within 30 days of a complaint or other notification, an alleged unauthorized default provider shall provide to the Commission's Consumer and Governmental Affairs Bureau a copy of any valid proof of verification of the default provider change.
- (n) An allegedly unauthorized provider must identify to the TRS Fund administrator all minutes submitted for reimbursement that are attributable to the TRS user after an allegedly unauthorized change of default provider is alleged to have occurred.
- (o) A TRS provider shall use, disclose, or permit access to customer proprietary network information (CPNI) upon request by the TRS Fund administrator or the Commission for administrative and investigative purposes.
- (p) If a TRS provider wishes to use CPNI, such provider must first obtain approval from the user. A TRS provider must maintain records of approval for at least one year thereafter.
- (q) TRS providers are required to provide users notice of their right to deny or restrict use of, disclosure of, or access to their CPNI prior to any solicitation for customer approval to use, disclose, or permit access to their CPNI. The provider must maintain records of this notification during the time period that the approval is in effect and for at least one year thereafter.
- (r) TRS providers are required to maintain for a minimum of three years a record of marketing campaigns that use their customers' CPNI, including a record of all instances where CPNI was disclosed to third parties. TRS providers shall establish a supervisory review process regarding TRS provider compliance with the rules for outbound marketing situations. TRS providers are required to have an officer sign and file with the Commission a compliance certification on an annual basis.
- (s) TRS providers are required to take all reasonable measures, including those measures outlined in the rule, to discover and protect against attempts to gain unauthorized access to CPNI. TRS providers are required to notify users immediately whenever a password, customer response to a back-up means of authentication for lost or forgotten passwords, online account, or address of record is created or changed.

- (t) A TRS provider shall notify law enforcement of a breach of its users' CPNI. The TRS provider shall not notify its customers or disclose the breach publicly, whether voluntarily or under state or local law or these rules, until it has completed the process of notifying law enforcement. The TRS provider shall provide a copy of the notification to the Disability Rights Office of the Consumer and Governmental Affairs Bureau at the same time as when the TRS provider notifies the users. Each TRS provider shall maintain a record, electronically or in some other manner, of any breaches discovered.

On March 23, 2017, the Commission adopted the *2017 VRS Improvements Order* amending its rules to improve the quality and efficiency of VRS. The Commission took the following actions, among others:

- (a) Established a voluntary at-home VRS call handling pilot program.
- (b) Established a procedure for VRS providers to assign iTRS numbers to hearing point-to-point video users to allow VRS users and hearing individuals who know sign language to make direct point-to-point videophone calls services over the facilities of VRS providers using VRS access technology.
- (c) Required VRS providers to request the TRS-URD administrator to remove from the TRS-URD user information for registered hearing point-to-point video users if the user requests the provider to do so or the VRS provider determines the user is ineligible.
- (d) Revised the rules governing changes of default TRS provider to include users of point-to-point video service over the facilities of a VRS provider using VRS access technology.
- (e) Revised the TRS CPNI rules to ensure that CPNI protections for TRS users include users of point-to-point video services over the facilities of a VRS provider using VRS access technology.

NEW INFORMATION COLLECTION REQUIREMENTS WHICH REQUIRES OMB REVIEW AND APPROVAL:

- (a) At-home VRS call handling pilot program limitations. Pursuant to 47 CFR § 64.604(b)(4)(iii), VRS CAs may not handle calls from at-home unless as part of the VRS call handling pilot program.
- (b) At-home VRS call handling pilot program notification. Pursuant to 47 CFR § 64.604(b)(8)(i), each VRS provider must notify the Commission of its intent to participate in the pilot program and submit a plan detailing how the VRS provider will run the program, including the screening process to select CAs, training, protocols, and expectations for CAs, the removal process for selected CAs, the setup of workstations, use of monitoring technology, interconnection with the VRS provider's network, a commitment to comply with safeguards, and a signed certification by an officer of the VRS provider that the provider will conduct inspections of at least five percent of the at-home workstations.
- (c) At-home VRS call handling pilot program personnel safeguards. Pursuant to 47 CFR § 64.604(b)(8)(iv), each VRS provider shall ensure that each CAs has the necessary experience, skills, and knowledge to effectively interpret from the at-home workstation, establish protocols and provider training, provide each at-home CA with support equivalent to support provided to CAs in call centers, establish grounds for dismissing CAs from the program, and obtain and retain a certification from each CA working in an at-home workstation that the CA understands and commits to comply with all the rules governing TRS.

- (d) At-home VRS call handling pilot program technical and environmental safeguards. Pursuant to 47 CFR § 64.604(b)(8)(v), each VRS provider shall ensure that each at-home work station resides in a separate, secure location within a CA's home, access is limited to the CA, allows a CA to use call-handling technology to the same extent as call center CAs, supports VRS in compliance with mandatory minimum technical and emergency call handling standards, is equipped with an effective means to prevent eavesdropping, and is connected to the providers' network over a secure connection.
- (e) At-home VRS call handling pilot program monitoring and oversight. Pursuant to 47 CFR § 64.608(vi), each VRS provider must inspect and approve each at-home workstation, assign a unique call center identification number to each workstation and use the number to identify all minutes handled from each such workstation in its call detail records, equip each at-home workstation with monitoring equipment, keep all records pertaining to at-home workstations for a minimum of five years, and conduct inspections of at least five percent of the at-home workstations each year.
- (f) At-home VRS call handling pilot program monthly reports. Pursuant to 47 CFR § 64.604(b)(8)(viii), each VRS provider must include with its monthly request for compensation the call center ID and full street address for each at-home workstation, the CA ID number for each individual handling VRS calls from that workstation, and the location and call center ID of each call center providing supervision for at-home workstations, plus the names of persons responsible for oversight of such workstations.
- (g) At-home VRS call handling pilot program six-month report. Each participating VRS provider shall submit a report covering the first six months of its program, which includes a description of the screening process, copies of training materials, copies of written protocols, the total number of CAs handling VRS calls from at-home workstations, the number of 911 calls handled by the at-home workstations, copies of surveys or evaluations taken of CAs concerning their experience using at home-workstations, total number of CAs terminated from the program, total number of complaints, if any, regarding the at-home call handling program or calls handled by at-home CAs, the total number of on-site inspections conducted, a description of the monitoring technology used, copies of reports produced by tracking software, and documentation of costs incurred in the use of at-home workstations.
- (h) Assignment of iTRS numbers to hearing point-to-point videophone users. Pursuant to 47 CFR § 64.611(a)(5), each VRS provider, before assigning iTRS numbers to hearing individuals, must:
 - (1) Obtain the user's full name; residential address; date of birth; and a written certification attesting the user is (i) proficient in sign language, (ii) understands that the iTRS number may only be used for point-to-point communication over distances with registered VRS users, and (iii) understands that such iTRS number may not be used to access VRS.
 - (2) Obtain the user's consent to provide information to the TRS-URD and keep a record of the affirmative acknowledgement of such consent by every user.
 - (3) Submit to the TRS-URD the users (i) full name; (ii) residential address; (iii) date of birth; (iv) a copy of the written certification; (v) the assigned ten-digit number; (vi) the VRS provider's name and the date of service initiation; and (vii) the date on which a ten-digit number was assigned to or removed from the user.
 - (4) Submit to the TRS-URD the date of termination of service upon the termination of service for any hearing point-to-point video user.

- (5) Maintain the confidentiality of the information collected from hearing individuals, except to the extent required by law or regulation.
- (6) Notify the TRS-URD of the transfer of a hearing point-to-point videophone user from another VRS provider and obtain and submit a certification.
- (i) Point-to-point videophone users porting. Each VRS provider must cease acquiring routing information from a point-to-point video user that ports his or her number to another VRS provider.
- (j) Point-to-Point videophone users' emergency calls. Pursuant to 47 CFR § 64.611(g)(1)(vii), each VRS provider must provide an explanation to hearing point-to-point video users that they will be unable to place emergency calls.
- (k) Removing point-to-point videophone users from the TRS-user registration database. Pursuant to 47 CFR § 64.615(a)(3)(i), each VRS provider shall request the administrator of the TRS-URD to remove user information for any hearing point-to-point user that (i) informs its provider that the user no longer wants use of a ten digit number for point-to-point video service or (ii) for whom the provider receives information that the user is not eligible to use the service.
- (l) Change of default TRS provider rules. 47 CFR § 64.630 has been revised to include point-to-point video service within the scope of the rules governing change of default TRS provider.
- (m) CPNI protections for point-to-point video service users. 47 CFR § 64.5101 has been revised to include users of point-to-point video service within the scope of the CPNI protection rules and associated reporting requirements.

This information collection affects individuals or households. The Commission is not the party collecting personally identifiable information (PII) for the purpose of populating the TRS-URD; the TRS-URD is made available and accessible by the Commission. Although TRS users are required to provide their personal information to register for using TRS service, such information is available only to a third-party independent vendor selected by the Commission's Managing Director and the Commission. The third party vendor and the Commission are required to maintain all registration information, including PII, in the TRS-URD confidential in accordance with the directives under contract with the Commission's Managing Director.

As required by Privacy Act 5 U.S.C. § 552a, the FCC published a system of records notice (SORN), FCC/CGB-4, "Internet-based Telecommunications Relay Service-User Registration Database (ITRS-URD)," on February 9, 2015 (80 FR 6963), which became effective on March 23, 2015, covering the PII that may be collected, maintained, used, and stored, and disposed of when obsolete, and which are part of the information associated with these information collection requirements, *i.e.*, the new SORN will ensure that the PII collected in this information collection will be handled in a manner consistent with the Privacy Act of 1974, as amended. Also, as required by the Office of Management and Budget Memorandum M-03-22 (September 26, 2003), the FCC is in the process of completing the Privacy Impact Assessment.

The statutory authority for these information collections can be found at section 225 and 251 of the Communications Act, 47 U.S.C. §§ 225, 251.

2. The *2013 VRS Reform Order* adopted several measures that contain information collection requirements designed to ensure that TRS is being offered in a manner that is functionally equivalent to a voice telephone service and, at the same time, the TRS Fund is protected from waste, fraud and abuse. These information collection requirements are necessary to protect the integrity of the TRS Fund, which pays for the provision of TRS.

The *2013 VRS Reform Order* also adopted reporting and recordkeeping requirements on potential providers seeking to offer voluntary iTRS services such as VRS, IP Relay, and IP CTS.

The *2017 VRS Improvements Order* contains information collection requirements. The following describes the parties who are involved in these information collections, why they are involved, and how the information that they provide is to be collected and used:

- (a) The records maintained by VRS providers that voluntarily participate in the at-home VRS call handling pilot program and the records submitted to the TRS Fund administrator and the FCC by these providers are used to determine the cost and effectiveness of VRS provided by CAs working at-home, as well as to determine whether the safeguards adequately protect against waste, fraud, and abuse. As such, these information collection requirements help ensure the integrity of the TRS Fund.
 - (b) For the assignment of iTRS numbers to hearing point-to-point video users, VRS providers collect and retain registration information and a certification from hearing individuals to ensure their eligibility. VRS providers also must (1) obtain consent from such users to collect and transmit the information to the TRS-URD, (2) update the information, and (3) request the TRS-URD administrator to remove user information from the database if the user asks to discontinue service or becomes ineligible. The information submitted to the TRS-URD will be used by TRS-URD administrator to perform user identification verification checks to validate the eligibility of the party on the video side of each call. Conducting identity checks and per call validation helps to ensure that only eligible users are making use of the service, prevent waste, fraud, and abuse, protect the integrity of the TRS Fund, and ensure the continued provision of TRS.
 - (c) The information collected and submitted as a result of including point-to-point video service within the scope of the rules governing change of default provider helps to ensure that VRS providers protect point-to-point video users from unauthorized changes of default provider, protect against waste, fraud, and abuse, ensure the integrity of the TRS Fund, and ensure the continued provision of TRS.
 - (d) VRS providers must obtain permission from point-to-point video service users to collect and retain CPNI and must ensure the protection of the user's information. The CPNI rules allow VRS providers to collect the information that is needed before providing service. VRS providers must notify appropriate authorities of CPNI breaches to ensure that adequate steps are taken to protect consumers. Such processes protect consumers' PII, help minimize waste, fraud, and abuse, and generally ensure the integrity of the TRS Fund.
3. The Commission encourages VRS providers to use information technology to whatever extent possible to reduce the burden of the information collections adopted in the *2013 VRS Reform Order* and the *2017 VRS Improvements Order*.

Reporting Fraudulent Activity. VRS providers may use electronic means to report fraudulent activity to the Commission.

Provider Certification – Annual Compliance Plan. VRS providers' annual compliance plans may be submitted to the Commission electronically.

Provider Certification – Response to Inadequate Annual Compliance Plan. VRS providers' responses to the Commission's determination that their annual plan is inadequate may be submitted electronically.

TRS User Certification of Eligibility. VRS providers are specifically permitted to obtain electronic signatures, and maintain electronic records, to comply with these requirements. The Commission

expects that a VRS provider's collection of this information, and reporting of this information, will be performed electronically.

TRS User Registration. An electronic means has been established for VRS providers to query the TRS-URD for user registration. User removal from, and queries to, the TRS-URD also will be performed electronically.

TRS-URD Per-Call Validation. Per-call validation will be conducted electronically to expedite the call process.

Verification of orders for change of default TRS providers. Authorizations required under this requirement may be electronically signed and preserved. Advance notice of default provider transfer sent to users may be made electronically, through pre-recorded sign language or textual messages.

Retention of authorization of orders for change of default TRS providers. This authorization may be maintained and preserved electronically by the new provider.

Notice of the transfer or sale of iTRS users. It is anticipated that advance notice will be sent out electronically by acquiring iTRS providers.

Identify TRS minutes attributable to unauthorized change. Provider communications with the TRS Fund are anticipated to be performed through electronic means.

Notice required for use of CPNI. TRS providers are specifically permitted to provide required notification through electronic means, including email.

Safeguards required for use of CPNI. Records of use of customers' CPNI may be preserved electronically, and reporting for iTRS providers is to be included in their annual reports.

Safeguards on the disclosure of CPNI. The Commission anticipates that most of the required safeguards will be performed through electronic methods.

Voluntary At-home VRS call handling pilot program. The Commission anticipates that VRS providers that voluntarily participate in the pilot program will collect, retain, and submit electronic records to comply with the requirements.

Certification of Eligibility. The Commission anticipates that VRS providers will obtain, maintain, and submit electronic records to comply with these requirements.

User Registration. An electronic means has been established for VRS providers to query the TRS-URD for user registration. User removal from and other provider interactions with the TRS-URD will also be performed electronically.

Verification of orders for change of default TRS provider. Authorizations required under this requirement may be electronically signed and preserved. Advance notice of default provider transfer sent to users may be made electronically through pre-recorded sign language or textual messages.

Retention of authorization of orders for change of default TRS provider. This authorization may be maintained and preserved electronically by the new provider.

Notice of the transfer or sale of iTRS users. It is anticipated that advance notice will be sent out electronically by acquiring iTRS providers.

Identify TRS minutes attributable to unauthorized change. Provider communications with the TRS Fund administrator are anticipated to be performed through electronic means.

Notice required for use of CPNI. TRS providers are specifically permitted to provide required notification through electronic means, including email.

Safeguards required for use of CPNI. Records of use of customers' CPNI may be preserved electronically, and iTRS provider reporting is to be included in their annual reports.

4. None of the information collected as a result of the *2013 VRS Reform Order* or the *2017 VRS Improvements Order* will be duplicative of other information.
5. In the *2013 VRS Reform Order*, the Commission attempted to balance the economic interests of small businesses with the significant public interest in reforming the VRS program and took several steps to minimize the information collection burden for small business concerns, including those with fewer than 25 employees.

Reporting Fraudulent Activity. VRS providers' reports of fraudulent activity may be submitted to the Commission electronically.

Provider Certification – Annual Compliance Plan. VRS providers' annual compliance plans may be submitted to the Commission electronically.

Internet-based TRS provider and TRS program certification – response to inadequate annual compliance plan. VRS providers' responses to the Commission's determination that their annual plans are inadequate may be submitted electronically.

Internet-based TRS registration. Any burdens associated with requirements relating to registering existing users will be time limited, and will ultimately reduce the record keeping burden on all providers, including small entities.

TRS-URD and administrator. The establishment of the TRS-URD will reduce the record keeping requirements that VRS providers, including small entities, would otherwise bear, and will ultimately simplify the process by which providers can ensure the eligibility of users.

Verification of orders for change of default TRS providers. Authorizations required under this requirement may be electronically signed and preserved. Advance notice of default provider transfer sent to users may be made electronically, through pre-recorded sign language or textual messages, relieving the burden on small entities and other providers.

Procedures for resolution of unauthorized changes in default provider. These procedures are anticipated to be performed and preserved electronically by the new provider.

Notice of the transfer or sale of iTRS users. It is anticipated that advance notice will be sent out electronically by acquiring iTRS providers.

Identify TRS minutes attributable to unauthorized change. Provider communications with the TRS Fund administrator are anticipated to be performed through electronic means.

Notice required for use of CPNI. TRS providers are specifically permitted to provide required notification through electronic means, including email, relieving the impact of this requirement on providers, including small entities.

Safeguards required for use of CPNI. Records of use of customers' CPNI may be preserved electronically, and iTRS provider reporting is to be included in their annual reports. As a consequence, no additional reporting documents will be required for these providers.

Safeguards on the disclosure of CPNI. The Commission anticipates that most of the required safeguards will be performed through electronic methods, many of which the providers may already have in place.

In the *2017 VRS Improvements Order*, to minimize the information collection burden for small business concerns, including those with fewer than 25 employees, the Commission limited the extension of the VRS providers' data gathering and recordkeeping obligations associated with the provision of iTRS numbers to the new group of hearing individuals who are eligible to receive such numbers for the limited purpose of point-to-point video calling. The Commission did not otherwise alter the information collection burden for small business concerns. Further, VRS providers, regardless of size, were given the option to participate in the voluntary VRS at-home call handling pilot program and may determine on their own accord whether the benefits of participation exceed the cost of complying with the terms of the pilot program.

6. *2013 VRS Reform Order.* Requiring VRS providers to report fraudulent activity helps to reduce waste, fraud and abuse. Absent this requirement, waste, fraud, and abuse can drain money from the TRS Fund and threaten the availability of relay services that are supported by the Fund for the benefit of legitimate users.

Requiring VRS providers to provide annual compliance plans helps ensure that providers prevent waste, fraud and abuse. Without it, the Commission's ability to review and enforce its TRS requirements would be hampered.

The requirement that VRS providers must submit information to the TRS-URD will greatly enhance the ability of the Commission to ensure that service is available to eligible users only and to protect the TRS Fund from waste, fraud and abuse. Specifically, if VRS providers were not required to validate the eligibility of the party on the video side of each call by querying the TRS-URD on a per-call basis, there would be no means of assuring the eligibility of users, posing a potential threat to the integrity of the TRS Fund.

Requirements preventing an unauthorized change of a user's default provider helps ensure that consumer protection policies are enhanced for TRS users, preventing users from being subjected to these unauthorized and unwanted changes. Moreover, it conforms the protections afforded to TRS users to those provided to other telephone users, in furtherance of Federal policy.

Restricting the ability of providers that have violated these provisions from receiving reimbursement from the TRS Fund will advance the Commission's ability to prevent unauthorized charges to the Fund.

The requirements relating to notice to TRS users of their right to deny or restrict use of, disclosure of, or access to their CPNI are a consumer protection device to ensure that TRS consumers are adequately notified of their privacy rights relating to use of their CPNI, and to ensure that TRS consumers have privacy rights equivalent to other telephone users.

If TRS providers were not required to maintain a record of use of their customers' CPNI, establish a procedure to ensure compliance with the Commission's restrictions on use of CPNI, and report on unauthorized use of CPNI, the Commission's ability to ensure compliance with these important consumer privacy requirements would be impaired.

The safeguards established to prevent the disclosure of CPNI are reasonable, augment the ability of TRS providers and the Commission to ensure the protection of TRS users' privacy, and ensure that TRS users have privacy rights equivalent to other telephone users.

2017 VRS Improvements Order. The requirements associated with registering hearing individuals who can sign to use point-to-point video service and assigning iTRS numbers to them is an extension of VRS providers' existing obligation to collect and maintain the required data to facilitate the assignment to and usage of such numbers by VRS users and to prevent waste, fraud, and abuse. Extending these existing obligations will ensure that hearing individuals who sign will benefit from the same privacy and consumer protections that are available to VRS users.

The required six-month report associated with the voluntary at-home VRS call handling pilot program will be a one-time collection. The information collection and reporting requirements will ensure that the FCC has accurate information to determine the costs and benefits of allowing at-home call handling, a practice that is currently prohibited. This information will help facilitate a Commission determination of whether to continue to permit at-home VRS call handling and whether to adjust any of the required safeguards for participating in the program.

7. Pursuant to 47 CFR § 64.604(b)(8)(vi)(D), each VRS provider that participates in the voluntary at-home VRS call handling pilot program must retain the data produced by workstation monitoring technology for a minimum of five years. The FCC requires this record retention period of more than three years to help ensure the integrity of the program and protect against waste, fraud, and abuse. This requirement need only be met if the VRS provider chooses to participate in the pilot program. The five-year requirement also aligns with other data retention obligations of VRS providers.

Pursuant to 47 CFR § 64.604(b)(8)(viii), each VRS provider that participates in the voluntary at-home VRS call handling pilot program must include in its monthly report to the TRS Fund administrator the call center ID, street address, and CA ID number for the CA handling the call, as well as the location and call center IDs of call centers that supervise the at-home workstations along with the names of the supervisors. This information is part of the monthly report that each VRS provider already gives to the TRS Fund administrator to enable the administrator to review the call data records so that each provider may be compensated on a monthly basis. See collection OMB No. 3060-1145.

Otherwise, the collections are not being conducted in any manner inconsistent with the guideline of 5 CFR § 1320.5(d)(2).

8. Pursuant to 5 CFR 1320.8(d), the Commission published a notice in the *Federal Register* on June 12, 2017, at 82 FR 26927, seeking comment from the public on the information collection requirements contained in this supporting statement. The Commission has not received any comments in response to the notice.
9. No payments or gifts will be given to respondents.
10. The TRS Fund administrator is required to keep all data obtained from TRS providers confidential and may not disclose such information in company-specific form unless directed to do so by the Commission. Further, the Commission takes several steps to specifically protect CPNI. As noted in item 1, the FCC completed the requirements for a system of records notice (SORN), FCC/CGB-4, "Internet-based Telecommunications Relay Service-User Registration Database (ITRS-URD)," which covers the PII that may be collected, maintained, used, stored, and disposed of when obsolete, and which is part of the information associated with these information collection requirements. This SORN should address any privacy concerns.
11. The FCC believes that this information collection does not raise any questions or issues of a sensitive nature for respondents.
12. The following represents revised estimates of the burden hours for the collection of information as a result of the new rules adopted in the *VRS Reform Order*. The Commission estimates that there are

approximately 17 potential TRS providers that would be affected by all of parts of this proposed collection.⁹ The *2017 VRS Improvements Order* does not affect the potential TRS providers affected by all or part of the proposed collection in the *VRS Reform Order*. Rather, the *VRS Improvements Order* adds new potential collection for some VRS providers that voluntarily participate in the at-home VRS call handling pilot program and slightly increases the information VRS providers must collect and report under some of these rules from hearing point-to-point videophone users. However, we will decrease the number of VRS providers and the according number of potential TRS providers because subsequent to the *VRS Reform Order* the total number of providers of VRS service decreased to five (5).

COMPONENTS FOR REPORTING AND RECORD KEEPING REQUIREMENTS

Of the 17 potential TRS providers (respondents), the Commission estimates that:

- Five (5) respondents provide a VRS service;
- One (1) respondent provides IP Relay service;
- Two (2) respondents provide traditional TTY TRS service;
- Two (2) respondents provide Captioned Telephone Service;
- Five (5) respondents provide IP Captioned Telephone Service; and
- Two (2) respondents provide Speech-to-Speech relay service.

Below are the estimated burdens associated with the new information collections adopted in the *VRS Reform Order* as amended by the collections in the *2017 VRS Improvements Order*:

(A) Reporting unauthorized and unnecessary use of VRS.

The Commission estimates that each respondent will require approximately 0.5 hour (30 minutes) to report to the Commission or the TRS Fund Administrator any of the following fraudulent activities: (1) false or unverified claims for TRS Fund compensation, (2) unauthorized use of VRS, (3) the making of VRS calls that would not otherwise be made, or (4) the use of VRS by persons who do not need the service in order to communicate in a functionally equivalent manner. The Commission estimates that each respondent will report to the Commission or the TRS Fund Administrator on the average of five times per quarter of the year (every 3 months).

Annual Number of Respondents: 5 (VRS providers)

Annual Number of Responses: 100 (5 responses per respondent per quarter x 5 respondents x 4 quarters)

Annual Burden Hours: 50 hours (0.5 hour per response x 100 responses)

The Commission assumes that respondents will use “in-house” personnel whose pay is comparable to senior level federal employees (GS-14/5) to report fraudulent activities.

The Commission estimates respondents’ costs to be about \$60.83 per hour to report:

Annual In-House Cost: 50 hours x \$60.83 per hour = \$3,041.50

(B) Provider Certification – Annual Compliance Plan.

⁹ Collectively, there are 17 TRS providers affected by this information collection. However, there are instances where fewer than 17 TRS providers will be subject to certain information collection requirements.

The Commission estimates that each respondent will require approximately 80 hours to prepare and submit an annual report of a compliance plan describing the provider's policies, procedures, and practices for complying with the requirements of preventing and reporting unauthorized and unnecessary use of VRS. Such compliance plan involves the following required information: (i) identification of any officer(s) or managerial employee(s) responsible for ensuring compliance with the requirements of preventing and reporting unauthorized and unnecessary use of VRS; (ii) a description of any compliance training provided to the provider's officers, employees, and contractors; (iii) identification of any telephone numbers, website addresses, or other mechanisms available to employees for reporting abuses; (iv) a description of any internal audit processes used to ensure the accuracy and completeness of minutes submitted to the TRS Fund administrator; and (v) a description of all policies and practices that the provider is following to prevent waste, fraud, and abuse of the TRS Fund.

Annual Number of Respondents: 5 (VRS providers)

Annual Number of Responses: 5 (1 response per respondent x 5 respondents)

Annual Burden Hours: 400 hours (80 hour per response x 5 responses)

The Commission assumes that respondents will use "in-house" personnel whose pay is comparable to senior level federal employees (GS-14/5) to prepare and submit an annual compliance plan report.

The Commission estimates respondents' costs to be about \$60.83 per hour to prepare and submit an annual compliance plan report:

Annual In-House Cost: 400 hours x \$60.83 per hour = \$24,332

(C) Provider Certification – Response to Inadequate Annual Compliance Plan.

The Commission estimates that 1 VRS providers will require approximately 5 hours to prepare and submit an amended compliance plan correcting the identified defects upon the Commission's request on an annual basis.

Annual Number of Respondents: 1 (VRS provider)

Annual Number of Responses: 1 (1 response per respondent x 1 respondent)

Annual Burden Hours: 5 hours (5 hours per response x 1 responses)

The Commission assumes that respondents will use "in-house" personnel whose pay is comparable to senior level federal employees (GS-14/15) to prepare and submit an amended compliance plan report.

The Commission estimates respondents' costs to be about \$60.83 per hour to prepare and submit an amended compliance plan report:

Annual In-House Cost: 5 hours x \$60.83 per hour = \$304.15

(D) TRS User Certification of Eligibility.

- (i) The Commission estimates that each respondent will require approximately 0.25 hour (15 minutes) to certify the eligibility of each VRS user. Such certifying process requires the respondent to first obtain written certification from the user containing specific attestations on a separate form, and must submit such certification for each existing user to the TRS-URD. The certification of eligibility must contain the 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. This is a one-time requirement that will be met within the first year.

Annual Number of Respondents: 5 (VRS Service providers) will certify 300,000 existing users, or **2 annualized VRS Service providers will certify 100,000 existing users annualized**

Annual Number of Responses: 300,000 (within the first year) (1 response per VRS users x 300,000), or **100,000 responses annualized**

Annual Burden Hours: 75,000 (within the first year) (0.25 hour per response x 300,000), or **25,000 hours annualized**

The Commission assumes that respondents will use “in-house” personnel whose pay is comparable to senior level federal employees (GS-14/5) to certify the eligibility of VRS users.

The Commission estimates respondents’ costs to be about \$60.83 per hour to certify the eligibility of VRS users:

Annual In-House Cost: \$4,562,250 (within the first year), or **\$1,520,750 annualized** (25,000 x \$60.83)

- (ii) The Commission estimates that 300,000 existing VRS user respondents will each require approximately 0.5 hour (30 minutes) to review, execute, and submit to the provider a certification of eligibility. The certification of eligibility must contain the 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. This is a one-time requirement that will be met within the first year.

Annual Number of Respondents: 300,000 existing VRS users, or **100,000 existing VRS users annualized**

Annual Number of Responses: 300,000 (within the first year) (1 response per VRS user x 300,000 VRS users), or **100,000 responses annualized**

Annual Burden Hours: 150,000 (within the first year) (0.5 hour per response x 300,000 responses), or **50,000 hours annualized**

There will be no cost to the VRS user respondents to review, execute, and submit these certifications to the VRS providers.

Annual In-House Cost: \$0

- (iii) The Commission estimates that each respondent will require approximately 0.25 hour (15 minutes) to certify the eligibility of each newly enrolled VRS user. Such certifying process requires the respondent to first obtain written certification from the user containing specific attestations on a separate form, and must submit such certification for each new user to the TRS-URD. The certification of eligibility must contain the 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.

Annual Number of Respondents: 5 (VRS Service providers) will enroll 30,000 new users

Annual Number of Responses: 30,000 (1 response per new user x 30,000)

Annual Burden Hours: 7,500 (0.25 hour per response x 30,000)

The Commission assumes that respondents will use “in-house” personnel whose pay is comparable to senior level federal employees (GS-14/5) to certify the eligibility of newly enrolled VRS users.

The Commission estimates respondents’ costs to be about \$60.83 per hour to certify the eligibility of newly enrolled VRS users:

Annual In-House Cost: 7,500 hours x \$60.83/hour = \$456,225

- (iv) The Commission estimates that 30,000 new VRS user respondents will require approximately 0.5 hour (30 minutes) to review, execute, and submit to the provider a certification of eligibility. The certification of eligibility must contain the 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.

Annual Number of Respondents: 30,000 new VRS users

Annual Number of Responses: 30,000 (1 response per VRS user x 30,000 VRS users)

Annual Burden Hours: 15,000 (0.5 hour per response x 30,000 responses)

There will be no cost to the VRS user respondents to review, execute, and submit these certifications to the VRS providers.

Annual In-House Cost: \$0

- (v) The Commission estimates that each respondent will require approximately 0.25 hours (15 minutes) to certify the eligibility of each newly enrolled hearing point-to-point videophone user. Such certifying process requires the respondent to first obtain written certification from the user containing specific attestations on a separate form, and must submit such certification for each new user to the TRS-URD. The certification of eligibility must contain the user’s attestation that the user: (1) is proficient in sign language; (2) understands that the iTRS number may be used only for point-to-point communication over distances with registered VRS users; and (3) understands that iTRS number may not be used to access VRS.

Annual Number of Respondents: 5 (VRS providers) will enroll 5,000 new users

Annual Number of Responses: 5,000 (1 response per new user x 5,000)

Annual Burden Hours: 1,250 (0.25 hour per response x 5,000)

The Commission assumes that respondents will use “in-house” personnel whose pay is comparable to senior level federal employees (GS-14/5) to certify the eligibility of newly enrolled VRS users.

The Commission estimates respondents’ costs to be about \$60.83 per hour to certify the eligibility of newly enrolled hearing point-to-point videophone users:

Annual In-House Cost: 1,250 hours x \$60.83 /hour = \$76,037.50

- (vi) The Commission estimates that 5,000 new hearing point-to-point videophone user respondents will require approximately 0.5 hour (30 minutes) to review, execute, and submit to the provider a certification of eligibility. The certification of eligibility must contain the user’s attestation that the user: (1) is proficient in sign language; (2) understands that the iTRS number may be used only for point-to-point communication over distances with registered VRS users; and (3) understands that iTRS number may not be used to access VRS.

Annual Number of Respondents: 5,000 new hearing point-to-point videophone users

Annual Number of Responses: 5,000 (1 response per user x 5,000 users)

Annual Burden Hours: 2,500 (0.5 hour per response x 5,000 responses)

There will be no cost to the user respondents to review, execute, and submit these certifications to the providers.

Annual In-House Cost: \$0

(E) TRS User Registration.

- (i) The Commission estimates that each respondent will require approximately 0.5 hour (30 minutes) to collect and submit specific information for each existing user to the TRS-URD, including the user's name, address, telephone number assigned in the TRS numbering directory, last four digits of the social security or Tribal Identification number, date of birth, Registered Location, VRS provider name and dates of service, self-certification of eligibility for VRS and the date obtained by the provider, the date on which the user's identification was verified, and (for existing users only) the date on which the registered Internet-based TRS user last placed a point-to-point or relay call. Providers are required to provide a clear explanation about the TRS-URD to each user and collect consent from each user to transmit the user's information to the TRS-URD. This is a one-time requirement that will be met within the first year.

Annual Number of Respondents: 5 (VRS providers) will collect and submit information for 300,000 existing users, **or 2 VRS providers will collect and submit information for 100,000 existing users annualized**

Annual Number of Responses: 300,000 (within the first year) (1 response per user x 300,000 users), **or 100,000 responses annualized**

Annual Burden Hours: 150,000 hours (within the first year) (0.5 hour per response x 300,000 responses), **or 50,000 hours annualized**

The Commission assumes that respondents will use "in-house" personnel whose pay is comparable to senior level federal employees (GS-14/5) to collect and submit the required information for each user to the TRS-URD.

The Commission estimates respondents' costs to be about \$60.83 per hour to collect and submit the required information for each user to the TRS-URD:

Annual In-House Cost: \$9,124,500 (within the first year), **or \$3,041,500 annualized** (50,000 hours x \$60.83 per)

- (ii) The Commission estimates that 300,000 existing VRS user respondents¹⁰ will each require approximately 0.5 hour (30 minutes) to submit to the provider specific information, including the user's name, address, last four digits of the social security or Tribal Identification number, date of birth, Registered Location, and consent to transmit the user's information to the TRS-URD. This is a one-time requirement that will be met within the first year.

Annual Number of Respondents: 300,000 existing VRS users, **or 100,000 existing VRS users annualized**

¹⁰ These are the same 300,000 (100,000 annualized) VRS user respondents that are identified in (D)(ii).

Annual Number of Responses: 300,000 (within the first year) (1 response per VRS user x 300,000 VRS users), or **100,000 responses annualized**

Annual Burden Hours: 150,000 hours (within the first year) (0.5 hour per response x 300,000 responses), or **50,000 hours annualized**

There will be no cost to the VRS user respondents to submit this information to the VRS providers.

Annual In-House Cost: \$0

- (iii) The Commission estimates that each respondent will require approximately 0.5 hour (30 minutes) to collect and submit specific information for each newly enrolled VRS user to the TRS-URD, including the user's name, address, telephone number assigned in the TRS numbering directory, last four digits of the social security or Tribal Identification number, date of birth, Registered Location, VRS provider name and dates of service, self-certification of eligibility for VRS and the date obtained by the provider, and the date on which the user's identification was verified. Providers are required to provide a clear explanation about the TRS-URD to each user and collect consent from each user to transmit the user's information to the TRS-URD.

Annual Number of Respondents: 5 (VRS providers) will enroll 30,000 new users

Annual Number of Responses: 30,000 (1 response per new users x 30,000 new users)

Annual Burden Hours: 15,000 hours (0.5 hour per response x 30,000 responses)

The Commission assumes that respondents will use "in-house" personnel whose pay is comparable to senior level federal employees (GS-14/5) to collect and submit the required information for each newly enrolled user to the TRS-URD.

The Commission estimates respondents' costs to be about \$60.83 per hour to collect and submit the required information for each newly enrolled user to the TRS-URD:

Annual In-House Cost: \$912,450 (15,000 hours x \$60.83 per hour)

- (iv) The Commission estimates that 30,000 new VRS user respondents¹¹ will require approximately 0.5 hour (30 minutes) to submit to the provider specific information, including the user's name, address, last four digits of the social security or Tribal Identification number, date of birth, Registered Location, and consent to transmit the user's information to the TRS-URD. This is a one-time requirement that will be met within the first year.

Annual Number of Respondents: 30,000 new VRS users

Annual Number of Responses: 30,000 (1 response per VRS user x 30,000 VRS users)

Annual Burden Hours: 15,000 hours (0.5 hour per response x 30,000 responses)

There will be no cost to the VRS user respondents to submit this information to the VRS providers.

Annual In-House Cost: \$0

- (v) The Commission estimates that each respondent will require approximately 0.5 hour (30 minutes) to collect and submit specific information for each newly enrolled hearing point-to-point videophone user to the TRS-URD User Registration Database, including the user's

¹¹ These are the same 30,000 VRS user respondents that are identified in (D)(iv).

name, address, telephone number assigned in the TRS numbering directory, last four digits of the social security or Tribal Identification number, date of birth, Registered Location, VRS provider name and dates of service, self-certification of eligibility and the date obtained by the provider, and the date on which the user's identification was verified. Providers are required to provide a clear explanation about the TRS-URD to each user and collect consent from each user to transmit the user's information to the TRS-URD.

Annual Number of Respondents: 5 (VRS providers) will enroll 5,000 new users.

Annual Number of Responses: 5,000 (1 response per new user x 5,000 new users)

Annual Burden Hours: 2,500 hours (0.5 hour per response x 5,000 responses)

The Commission assumes that respondents will use "in-house" personnel whose pay is comparable to senior level federal employees (GS-14/5) to collect and submit the required information for each newly enrolled user to the TRS-URD.

The Commission estimates respondents' costs to be about \$60.83 per hour to collect and submit the required information for each newly enrolled user to the TRS-URD:

Annual In-House Cost: 2,500 hours x \$60.83 /hour =\$152,075

- (vi) The Commission estimates that 5,000 new hearing point-to-point videophone user respondents¹² will require approximately 0.5 hour (30 minutes) to submit to the provider specific information, including the user's name, address, last four digits of the social security or Tribal Identification number, date of birth, Registered Location, and consent to transmit the user's information to the TRS-URD.

Annual Number of Respondents: 5,000 new hearing point-to-point videophone users.

Annual Number of Responses: 5,000 (1 response per user x 5,000 users)

Annual Burden Hours: 2,500 hours (0.5 hour per response x 5,000 responses)

There will be no cost to the user respondents to submit this information to the providers.

Annual In-House Cost: \$0

- (vii) The Commission estimates that each respondent will require approximately 0.05 hour (3 minutes) to retain a record of consent from each existing VRS user to transmit each existing VRS user's information to the TRS-URD. This is a one-time requirement that will be met within the first year.

Annual Number of Respondents: 5 (VRS providers) will retain consent records from 300,000 existing users, **or 2 VRS providers will retain consent records from 100,000 existing users annualized**

Annual Number of Responses: 300,000 (within the first year) (1 response per user x 300,000 users), **or 100,000 responses annualized**

Annual Burden Hours: 15,000 (within the first year) (0.05 hour per response x 300,000 responses), **or 5,000 hours annualized**

The Commission assumes that respondents will use "in-house" personnel whose pay is comparable to senior level federal employees (GS-14/5) to retain a record of consent from each user to transmit the user's information to the TRS-URD.

¹² These are the same 5,000 hearing point-to-point videophone user respondents that are identified in (D)(vi).

The Commission estimates respondents' costs to be about \$60.83 per hour to retain a record of consent from each user to transmit the user's information to the TRS-URD:

Annual In-House Cost: \$912,450 (within the first year), or **\$304,150 annualized** (5,000 hours x \$60.83)

- (viii) The Commission estimates that each respondent will require approximately 0.05 hour (3 minutes) to retain a record of consent from each new VRS user to transmit each new VRS user's information to the TRS-URD.

Annual Number of Respondents: 5 (VRS providers) will retain consent records from 30,000 new users

Annual Number of Responses: 30,000 (1 response per new user x 30,000 new users)

Annual Burden Hours: 1,500 (0.05 hour per response x 30,000 responses)

The Commission assumes that respondents will use "in-house" personnel whose pay is comparable to senior level federal employees (GS-14/5) to retain a record of consent from each user to transmit the user's information to the TRS-URD.

The Commission estimates respondents' costs to be about \$60.83 per hour to retain a record of consent from each user to transmit the user's information to the TRS-URD:

Annual In-House Cost: \$91,245 (1,500 hours x \$60.83 per hour)

- (ix) The Commission estimates that each respondent will require approximately 0.05 hour (3 minutes) to retain a record of consent from each hearing point-to-point videophone user to transmit each such user's information to the TRS-URD.

Annual Number of Respondents: 5 (VRS providers) will retain consent records from 5,000 new hearing point-to-point videophone users

Annual Number of Responses: 5,000 (1 response per new user x 5,000 new users)

Annual Burden Hours: 250 (0.05 hour per response x 5,000 responses)

The Commission assumes that respondents will use "in-house" personnel whose pay is comparable to senior level federal employees (GS-14/5) to collect and submit the required information for each newly enrolled user to the TRS-URD.

The Commission estimates respondents' costs to be about \$60.83 per hour to collect and submit the required information for each newly enrolled user to the TRS-URD:

Annual In-House Cost: 250 hours x \$60.83/hour = \$15,207.50

(F) TRS-URD Per-Call Validation.

Because the process of using the TRS-URD for per-call validation will be done automatically, there will be no burden hours associated with each individual per-call validation; however each provider will have burden hours associated with software development to establish the process. The Commission estimates that each respondent will require approximately 300 hours to develop the software to validate the eligibility of the party on the video side of each call by querying the TRS-URD on a per-call basis through a unique user identifier assigned by the administrator of the TRS-URD. This is a one-time requirement to be annualized over the course of 3 years.

Annual Number of Respondents: 5 (VRS providers), or **2 VRS providers annualized**

Annual Number of Responses: 5 (1 response x 5 respondents), or **2 responses annualized** (rounded)

Annual Burden Hours: 1,500 hours (300 hours per response x 5 respondents), or **500 hours annualized**

The Commission assumes that respondents will use “in-house” personnel whose pay is comparable to senior level federal employees (GS-14/5) for the development of software to validate the eligibility of the party on the video side of each call by querying the TRS-URD on a per-call basis through a unique user identifier assigned by the administrator of the TRS-URD.

The Commission estimates respondents’ costs to be about \$60.83 per hour for the development of software to validate the eligibility of the party on the video side of each call by querying the TRS-URD on a per-call basis through a unique user identifier assigned by the administrator of the TRS-URD:

Annual In-House Cost: 1,500 hours x \$60.83 per hour = \$91,245, or **\$30,415, annualized**

(G) Removal from the TRS-URD.

- (i) The Commission estimates that each respondent will require approximately 0.1 hour (6 minutes) to submit each request to the administrator of the TRS-URD to remove from the TRS-URD user information for each registered VRS user who no longer wants, or is no longer eligible to use a ten-digit number for TRS.

Annual Number of Respondents: 5 (VRS and VRS CA Service providers)

Annual Number of Responses: 15,000 (3,000 responses per respondent x 5 respondents)

Annual Burden Hours: 1,500 hours (0.1 hour per response x 15,000 responses)

The Commission assumes that respondents will use “in-house” personnel whose pay is comparable to senior level federal employees (GS-14/5) to submit requests to the administrator of the TRS-URD to remove from the TRS-URD user information for each registered user who no longer wants, or is no longer eligible to use a ten-digit number for TRS.

The Commission estimates respondents’ costs to be about \$60.83 per hour to submit requests to the administrator of the TRS-URD to remove from the TRS-URD user information for any registered user who no longer wants, or is no longer eligible to use a ten-digit number for TRS:

Annual In-House Cost: 1,500 hours x \$60.83 per hour = \$91,245

- (ii) The Commission estimates that each respondent will require approximately 0.1 hour (6 minutes) annually to submit each request to the administrator of the TRS-URD to remove from the TRS-URD user information for each registered point-to-point video user who no longer wants, or is no longer eligible, to use a ten-digit number for TRS.

Annual Number of Respondents: 5 (VRS providers)

Annual Number of Responses: 250 (50 responses per respondent x 5 respondents)

Annual Burden Hours: 25 hours (0.1 hour per response x 250 responses)

The Commission assumes that respondents will use “in-house” personnel whose pay is comparable to senior level federal employees (GS-14/5) to submit requests to the

administrator of the TRS-URD to remove from the TRS-URD user information for each registered user who no longer wants, or is no longer eligible, to use a ten-digit number for TRS.

The Commission estimates respondents' costs to be about \$60.83 per hour to submit requests to the administrator of the TRS-URD to remove from the TRS-URD user information for each registered user who no longer wants, or is no longer eligible, to use a ten-digit number for TRS:

Annual In-House Cost: 25 hours x \$60.83/hour = \$1,520.75

(H) Assignment of user's unique identifier.

- (i) The Commission estimates that each provider will require approximately 0.05 hour (3 minutes) to obtain each unique identifier from the TRS-URD on a one-time basis within the first year.

Annual Number of Respondents: 5 (VRS providers) will obtain 300,000 existing users unique identifiers, or **2 VRS providers will obtain 100,000 existing users unique identifiers annualized**

Annual Number of Responses: 300,000 (within the first year) (1 response per user x 300,000 users), or **100,000 annualized**

Annual Burden Hours: 15,000 hours (within the first year) (0.05 hour per response x 300,000 responses), or **5,000 hours annualized**

The Commission assumes that the providers will use "in-house" personnel whose pay is comparable to senior level federal employees (GS-14/5) to obtain unique identifiers from the TRS-URD.

The Commission estimates the providers' costs to be about \$60.83 per hour to obtain unique identifiers from the TRS-URD:

Annual In-House Cost: 15,000 hours x \$60.83 per hour = \$912,450 (within the first year), or **\$304,150 annualized**

- (ii) The Commission estimates that each provider will require approximately 0.05 hour (3 minutes) to obtain each unique identifier for each new VRS user from the TRS-URD.

Annual Number of Respondents: 5 (VRS providers) will obtain 30,000 new users unique identifiers

Annual Number of Responses: 30,000 (1 response per user x 30,000 users)

Annual Burden Hours: 1,500 hours (0.05 hour per response x 30,000 responses)

The Commission assumes that the providers will use "in-house" personnel whose pay is comparable to senior level federal employees (GS-14/5) to obtain unique identifiers from the TRS-URD.

The Commission estimates the providers' costs to be about \$60.83 per hour to obtain unique identifiers from the TRS-URD:

Annual In-House Cost: 1,500 hours x \$60.83 per hour = \$91,245

(iii) The Commission estimates that each provider will require approximately 0.05 hour (3 minutes) to obtain each unique identifier for each hearing point-to-point videophone user from the TRS-URD.

Annual Number of Respondents: 5 (VRS providers) will obtain 5,000 hearing point-to-point video unique identifiers

Annual Number of Responses: 5,000 (1 response per user x 5,000 users)

Annual Burden Hours: 250 hours (0.05 hour per response x 5,000 responses)

The Commission assumes that the providers will use “in-house” personnel whose pay is comparable to senior level federal employees (GS-14/5) to obtain unique identifiers from the TRS-URD.

The Commission estimates the providers’ costs to be about \$60.83 per hour to obtain unique identifiers from the TRS-URD:

Annual In-House Cost: 250 hours x \$60.83 per hour = \$15,207.50

(I) Verification of orders for change of default TRS providers.

The Commission estimates that each provider will require approximately 0.5 hour (30 minutes) on an on-going basis to process the verification of orders for change of default provider for each response which involves the verification of an independent third party.

Annual Number of Respondents: 5 providers (5 VRS providers)

Annual Number of Responses: 12,000 (2,400 responses per respondent x 5 respondents)

Annual Burden Hours: 6,000 hours (0.5 hour per response x 12,000 responses)

The Commission assumes that the providers will use “in-house” personnel whose pay is comparable to senior level federal employees (GS-14/5) to process the verification of orders for change of default provider.

The Commission estimates the providers’ costs to be about \$60.83 per hour to process the verification of orders for change of default provider:

Annual In-House Cost: 6,000 hours x \$60.83 per hour = \$364,980

(J) Retention of authorization of orders for change of default iTRS providers.

The Commission estimates that the new default provider will require approximately 0.1 hour (6 minutes) on an on-going basis to retain each authorization of change order for a minimum period of five years, which must be available to the Commission upon request.

Annual Number of Respondents: 5 (5 VRS providers)

Annual Number of Responses: 12,000 (2,400 responses per respondent x 5 respondents)

Annual Burden Hours: 1,200 hours (0.1 hour per response x 12,000 responses)

The Commission assumes that the new default providers will use “in-house” personnel whose pay is comparable to senior level federal employees (GS-14/5) to retain authorization of change orders for a minimum period of five years.

The Commission estimates the providers’ costs to be about \$60.83 per hour to retain authorization of change orders for a minimum period of five years:

Annual In-House Cost: 1,200 hours x \$60.83 per hour = \$72,996

(K) Notice of the transfer or sale of iTRS users.

The Commission estimates that each respondent will require approximately 0.15 hour (9 minutes) on an on-going basis to prepare and send advance notice to each affected TRS user of the transfer or sale of TRS users. Such notice must be provided in ASL to VRS users and in text to IP Relay users, in a manner conforming with the Commission's rules regarding accessibility to blind and visually-impaired consumers, and must include specific information on the transfer. The Commission estimates one such transfer or sale annually.

Annual Number of Respondents: 1 (1 VRS or IP Relay provider)

Annual Number of Responses: 100,000 (100,000 responses per respondent x 1 respondents)

Annual Burden Hours: 15,000 hours (0.15 hour per response x 100,000 responses)

The Commission assumes that each respondent will use "in-house" personnel whose pay is comparable to senior level federal employees (GS-14/5) to prepare and send advance notice to each affected user.

The Commission estimates the provider's costs to be about \$60.83 per hour to prepare and send advance notice to each affected user:

Annual In-House Cost: 15,000 hours x \$60.83 per hour = \$912,450

(L) Proof of Verification of the Default Provider Change.

The Commission estimates that each respondent will require approximately 0.25 hour (15 minutes) on an on-going basis to prepare and send to the Commission's Consumer and Governmental Affairs Bureau a copy of any valid proof of verification of default provider change, when requested.

Annual Number of Respondents: 5 (5 VRS providers)

Annual Number of Responses: 300 (60 responses per respondent x 5 respondents)

Annual Burden Hours: 75 hours (0.25 hour per response x 300 responses)

The Commission assumes that each respondent will use "in-house" personnel whose pay is comparable to senior level federal employees (GS-14/5) to prepare and send to the Commission's Consumer and Governmental Affairs Bureau a copy of any valid proof of verification of default provider change.

The Commission estimates each respondent's costs to be about \$60.83 per hour to prepare and send to the Commission's Consumer and Governmental Affairs Bureau a copy of any valid proof of verification of default provider change:

Annual In-House Cost: 75 hours x \$60.83 per hour = \$4,562.25

(M) Identify TRS minutes attributable to unauthorized change.

The Commission estimates that each respondent (the allegedly unauthorized provider) will require approximately 0.5 hour (30 minutes) on an on-going basis to identify to the TRS Fund administrator all minutes submitted for reimbursement that are attributable to the TRS user after an allegedly unauthorized change of default provider is alleged to have occurred.

Annual Number of Respondents: 5 (5 VRS providers)

Annual Number of Responses: 120 (24 responses per respondent x 5 respondents)

Annual Burden Hours: 60 hours (0.5 hour per response x 120 responses)

The Commission assumes that each respondent will use “in-house” personnel whose pay is comparable to senior level federal employees (GS-14/5) to identify to the TRS Fund administrator all minutes submitted for reimbursement that are attributable to the TRS user after an allegedly unauthorized change of default provider is alleged to have occurred.

The Commission estimates each respondent’s costs to be about \$60.83 per hour to identify to the TRS Fund administrator all minutes submitted for reimbursement that are attributable to the TRS user after an allegedly unauthorized change of default provider is alleged to have occurred:

Annual In-House Cost: 60 hours x \$60.83 per hour = \$3,649.80

(N) Access to CPNI.

The Commission estimates that each respondent will require approximately 1 hour on an on-going basis to prepare a response to the TRS Fund administrator’s or the Commission’s request to disclose, or permit access to CPNI for administrative and investigative purposes.

Annual Number of Respondents: 17

Annual Number of Responses: 204 (12 responses per respondent x 17 respondents)

Annual Burden Hours: 204 hours (1 hour per response x 204 responses)

The Commission assumes that each respondent will use “in-house” personnel whose pay is comparable to senior level federal employees (GS-14/5) to prepare a response to the Fund administrator’s or the Commission’s request to disclose, or permit access to CPNI.

The Commission estimates each respondent’s costs to be about \$60.83 per hour to prepare a response to the Fund administrator’s or the Commission’s request to disclose, or permit access to CPNI:

Annual In-House Cost: 204 hours x \$60.83 per hour = \$12,409.32

(O) Approval required for use of CPNI.

(i) The Commission estimates that each respondent will require approximately 0.1 hour (6 minutes) on an on-going basis to obtain approval from the user if the respondent wishes to use CPNI, and to maintain records of approval for at least one year thereafter.

Annual Number of Respondents: 17

Annual Number of Responses: 510,000 (30,000 responses per respondent x 17 respondents)

Annual Burden Hours: 51,000 hours (0.1 hour per response x 510,000 responses)

The Commission assumes that each respondent will use “in-house” personnel whose pay is comparable to senior level federal employees (GS-14/5) to obtain approval from the user if the respondent wishes to use CPNI, and to maintain records of approval for at least one year thereafter.

The Commission estimates each respondent’s costs to be about \$60.83 per hour to obtain approval from the user if the respondent wishes to use CPNI, and to maintain records of approval for at least one year thereafter:

Annual In-House Cost: 51,000 hours x \$60.83 per hour = \$3,102,330

(ii) The Commission estimates that 170,000 user respondents¹³ will require approximately 0.1 hour (6 minutes) each to give approval to the provider to use CPNI.

Annual Number of Respondents: 170,000 users

Annual Number of Responses: 510,000 (3 responses per respondent x 170,000 respondents)

Annual Burden Hours: 51,000 hours (0.1 hour per response x 510,000 responses)

There will be no cost to the user respondents to give approval to the providers to use CPNI.

Annual In-House Cost: \$0

(P) Notice required for use of CPNI.

The Commission estimates that each respondent will require approximately 0.2 hour (12 minutes) on an on-going basis to notify users of their right to deny or restrict use of, disclosure of, or access to their CPNI prior to any solicitation for customer approval to use, disclose, or permit access to their CPNI, including their right to opt-in or opt-out of using their CPNI, and to maintain records of such notification during the time period that the approval is in effect and for at least one year thereafter.

Annual Number of Respondents: 17

Annual Number of Responses: 510,000 (30,000 responses per respondent x 17 respondents)

Annual Burden Hours: 102,000 hours (0.2 hour per response x 510,000 responses)

The Commission assumes that each respondent will use “in-house” personnel whose pay is comparable to senior level federal employees (GS-14/5) to notify users of their right to deny or restrict use of, disclosure of, or access to their CPNI prior to any solicitation for customer approval to use, disclose, or permit access to their CPNI, including their right to opt-in or opt-out of using their CPNI, and to maintain records of such notification for at least one year.

The Commission estimates each respondent’s costs to be about \$60.83 per hour to notify users of their right to deny or restrict use of, disclosure of, or access to their CPNI prior to any solicitation for customer approval to use, disclose, or permit access to their CPNI, including their right to opt-in or opt-out of using their CPNI, and to maintain records of such notification for at least one year:

Annual In-House Cost: 102,000 hours x \$60.83 per hour = \$6,204,660

(Q) Safeguards required for use of CPNI.

The Commission estimates that each respondent will require approximately 40 hours annually to maintain for a minimum of three years a record of marketing campaigns that use their customers’ CPNI, including a record of all instances where CPNI was disclosed to third parties, to establish a supervisory review process regarding TRS provider compliance with the rules for outbound marketing situations, and to have an officer sign and file with the Commission a compliance certification on an annual basis, based on his or her personal knowledge, and including a statement accompanying the certification explaining how the provider’s operating procedures ensure that it is or is not in compliance with these rules, and an explanation of any actions taken against data brokers, a summary of all customer complaints in the past year concerning the

¹³ These 170,000 user respondents include both VRS and hearing point-to-point videophone users and are a subset of the combined 300,000 (100,000 annualized) existing VRS user respondents, 30,000 new VRS user respondents, and 5,000 hearing point-to-point videophone user respondents that are identified in (D)(ii), (iv), and (vi).

unauthorized release of CPNI, and a report detailing all instances where the TRS provider used, disclosed, or permitted access to CPNI without complying with the required procedures. Such report must include instances where the opt-out mechanisms did not work properly, to such a degree that consumers' inability to opt-out was more than an anomaly.

Annual Number of Respondents: 17

Annual Number of Responses: 17 (1 response per respondent x 17 respondents)

Annual Burden Hours: 680 hours (40 hours per response x 17 responses)

The Commission assumes that each respondent will use "in-house" personnel whose pay is comparable to senior level federal employees (GS-14/5) to maintain records of marketing campaigns that use their customers' CPNI and to prepare and submit a report associated with marketing campaigns that use their customers' CPNI as described above.

The Commission estimates each respondent's costs to be about \$60.83 per hour to maintain a record of marketing campaigns that use their customers' CPNI and to prepare and submit a report associated with marketing campaigns that use their customers' CPNI as described above:

Annual In-House Cost: 680 hours x \$60.83 per hour = \$41,364.40

(R) *Safeguards on the disclosure of CPNI.*

The Commission estimates that each respondent will require approximately 0.2 hour (12 minutes) on an on-going basis to notify customers immediately whenever a password, customer response to a back-up means of authentication for lost or forgotten passwords, online account, or address of record is created or changed.

Annual Number of Respondents: 17

Annual Number of Responses: 17,000 (1,000 responses per respondent x 17 respondents)

Annual Burden Hours: 3,400 hours (0.2 hour per response x 17,000 responses)

The Commission assumes that each respondent will use "in-house" personnel whose pay is comparable to senior level federal employees (GS-14/5) to notify customers immediately whenever a password, customer response to a back-up means of authentication for lost or forgotten passwords, online account, or address of record is created or changed.

The Commission estimates that each respondent's costs to be about \$60.83 per hour to notify customers immediately whenever a password, customer response to a back-up means of authentication for lost or forgotten passwords, online account, or address of record is created or changed:

Annual In-House Cost: 3,400 hours x \$60.83 per hour = \$206,822

(S) *Notification of CPNI security breaches.*

The Commission estimates that each respondent will require approximately 4 hours on an on-going basis to: (1) first notify law enforcement of a breach of its customers' CPNI, (2) to notify its customers of the security breach (after completion of the process of notifying law enforcement), (3) to provide a copy of the notification with the Disability Rights Office of the Consumer and Governmental Affairs Bureau at the same time as when the TRS provider notifies the customers, and (4) to maintain a record, electronically or in some other manner, of any breaches discovered.

Annual Number of Respondents: 17

Annual Number of Responses: 68 (4 responses per respondent x 17 respondents)

Annual Burden Hours: 272 hours (4 hours per response x 68 responses)

The Commission assumes that each respondent will use “in-house” personnel whose pay is comparable to senior level federal employees (GS-14/5) (1) to first notify law enforcement of a breach of its customers’ CPNI, (2) to notify its customers of the security breach (after completion of the process of notifying law enforcement), (3) to provide a copy of the notification with the Disability Rights Office of the Consumer and Governmental Affairs Bureau at the same time as when the TRS provider notifies the customers, and (4) to maintain a record, electronically or in some other manner, of any breaches discovered.

The Commission estimates that each respondent’s costs to be about \$60.83 per hour (1) to first notify law enforcement of a breach of its customers’ CPNI, (2) to notify its customers of the security breach (after completion of the process of notifying law enforcement), (3) to provide a copy of the notification with the Disability Rights Office of the Consumer and Governmental Affairs Bureau at the same time as when the TRS provider notifies the customers, and (4) to maintain a record, electronically or in some other manner, of any breaches discovered:

Annual In-House Cost: 272 hours x \$60.83 per hour = \$16,545.76

(T) *At-home VRS call handling pilot program notification.*

The Commission estimates that each respondent will require approximately 120 hours to prepare all of the necessary materials and submit to the Commission a plan detailing how the VRS provider will operate its at-home VRS call handling pilot program including the screening process to select CAs, training, protocols, and expectations for CAs, the removal process for selected CAs, the setup of workstations, use of monitoring technology, interconnection with the VRS provider’s network, a commitment to comply with safeguards, and a signed certification by an officer of the VRS providers that the provider will conduct inspections of at least five percent of the at-home workstations. This is a one-time requirement that will be met prior to the start of the pilot program.

Annual Number of Respondents: 5 (VRS providers), or **2 VRS providers respondents annualized**

Annual Number of Responses: 5 (1 response per respondent x 5 respondents), or **2 responses annualized (rounded)**

Annual Burden Hours: 600 (120 hours per response x 5 responses), or **200 hours annualized**

The Commission assumes that each respondent will use “in-house” personnel whose pay is comparable to senior level federal employees (GS-14/5) to prepare and submit a plan to the Commission detailing how the VRS provider will run its VRS call handling pilot program.

The Commission estimates that each respondent’s costs to be about \$60.83 per hour to prepare and submit a plan to the Commission detailing how the VRS provider will run its VRS call handling pilot program.

Annual In-House Cost: 600 hours x \$60.83 per hour = \$36,498, or **\$12,166 annualized**

(U) *At-home VRS call handling pilot program safeguards – CA certifications.*

- (i) The Commission estimates that each respondent will require approximately 0.25 hour (15 minutes) to collect and retain a certification from each CA participating in the at-home VRS call handling pilot program that the CA understands and commits to comply with all the rules governing TRS. This is a one-time requirement that will be met at the start of the program.

Annual Number of Respondents: 5 respondents (VRS providers), or **2 respondents annualized** will collect and retain certifications from an estimated number of 200 CAs per provider participating in the at-home VRS call handling pilot program.

Annual Number of Responses: 1,000 (1 response per CA x 200 CAs per respondent x 5 respondents), or **333 responses annualized**

Annual Burden Hours: 250 hours (0.25 hour per response x 1,000 responses), or **83 hours annualized**

The Commission assumes that respondents will use “in-house” personnel whose pay is comparable to senior level federal employees (GS-14/5) to collect and retain a certification from each CA participating in the at-home VRS call handling pilot program.

The Commission estimates that each respondent’s costs to be about \$60.83 per hour to collect and retain a certification from each CA participating in the at-home VRS call handling pilot program.

Annual In-House Cost: 250 hours x \$60.83 per hour = \$15,207.50, or **\$5,069.17 annualized**

- (ii) The Commission estimates that each CA respondent participating in the at-home VRS call handling pilot program will require approximately 0.5 hour (30 minutes) to certify that the CA understands and commits to comply with all the rules governing TRS. This is a one-time requirement that will be met at the start of the program.

Annual Number of Respondents: 1,000 CAs participating in the at-home VRS call handling pilot program, or **333 CAs annualized**

Annual Number of Responses: 1,000 (1 response per CA x 1,000 CAs), or **333 responses annualized**

Annual Burden Hours: 500 hours (0.5 hour per response x 1,000 responses), or **167 hours annualized**

There will be no cost to the CA respondents participating in the at-home VRS call handling pilot program to provide their certifications to the providers.

Annual In-House Cost: \$0

(V) At-home VRS call handling pilot program monitoring and oversight.

- (i) The Commission estimates that each respondent will require approximately 1 hour to inspect and approve each at-home workstation of the 200 estimated CAs per provider participating in the trial program. This is a one-time requirement that will be met prior to the start of the pilot program.

Annual Number of Respondents: 5 (VRS providers) will equip at-home workstations, or 2 VRS providers will equip at-home workstations annualized.

Annual Number of Responses: 1,000 (1 workstation x 200 CAs x 5 respondents), or **333 responses annualized (rounded)**

Annual Burden Hours: 1,000 hours (1 hour x 1,000 responses), or **333 hours annualized (rounded)**

The Commission assumes that respondents will use “in-house” personnel whose pay is comparable to senior level federal employees (GS-14/5) to inspect and approve each at-home workstation.

The Commission estimates that each respondent’s costs to be about \$60.83 per hour to inspect and approve each at-home workstation.

Annual In-House Cost: 1,000 hours x \$60.83 per hour = \$60,830, or **\$20,276.67 annualized**

- (ii) The Commission estimates that each respondent will require approximately 0.1 hour (6 minutes) to assign a unique call center identification number to each of the estimated 200 workstations and use the number to identify all minutes handled from each such workstation in its call detail records;

Annual Number of Respondents: 5 (VRS providers) will assign a unique call center identification number to each of the estimated 200 workstations per provider and use the number to identify all minutes handled from each such workstation in its call detail records.

Annual Number of Responses: 1,000 (1 call center identification number x 200 workstations x 5 respondents)

Annual Burden Hours: 100 hours (0.1 hours x 1,000 responses)

The Commission assumes that respondents will use “in-house” personnel whose pay is comparable to senior level federal employees (GS-14/5) to assign a unique call center identification number to each of the estimated 200 workstations per provider and use the number to identify all minutes handled from each such workstation in its call detail records.

The Commission estimates that each respondent’s costs to be about \$60.83 per hour to assign a unique call center identification number to each of the estimated 200 workstations per provider and use the number to identify all minutes handled from each such workstation in its call detail records.

Annual In-House Cost: 100 hours x \$60.83 per hour = \$6,083

- (iii) The Commission estimates that each respondent will require approximately 0.1 hour (6 minutes) to keep all records pertaining to at-home workstations for a minimum of five years.

Annual Number of Respondents: 5 (VRS providers) will keep all records pertaining to at-home workstations for a minimum of five years.

Annual Number of Responses: 1,000 (200 workstations x 5 respondents)

Annual Burden Hours: 100 hours (0.1 hours x 1,000 responses)

The Commission assumes that respondents will use “in-house” personnel whose pay is comparable to senior level federal employees (GS-14/5) to keep all records pertaining to at-home workstations for a minimum of five years.

The Commission estimates that each respondent’s costs to be about \$60.83 per hour to keep all records pertaining to at-home workstations for a minimum of five years.

Annual In-House Cost: 100 hours x \$60.83 per hour = \$6,083

(iv) The Commission estimates that each respondent will require approximately 1 hour per at-home workstation to conduct inspections of at least five percent of the estimated 200 at-home workstations per provider participating in the pilot program.

Annual Number of Respondents: 5 (VRS providers) will conduct inspections of at least five percent of the estimated 200 at-home workstations per provider.

Annual Number of Responses: 50 (200 workstations x 5% x 5 respondents)

Annual Burden Hours: 50 hours (1 hours x 50 responses)

The Commission assumes that respondents will use “in-house” personnel whose pay is comparable to senior level federal employees (GS-14/5) to conduct inspections of at least five percent of the estimated 200 at-home workstations per provider.

The Commission estimates that each respondent’s costs to be about \$60.83 per hour to conduct inspections of at least five percent of the estimated 200 at-home workstations per provider.

Annual In-House Cost: 50 hours x \$60.83 per hour = \$3,041.50

(W) At-home VRS call handling pilot program monthly reports.

The Commission estimates that each respondent will require 0.50 hours (30 minutes) to include with their monthly requests for compensation: the call center ID and full street address for each at-home workstation, the CA ID number for each individual handling VRS calls from that workstation, and the location and call center ID of call centers providing supervision for at-home workstations, plus the names of persons responsible for oversight of such workstations.

Annual Number of Respondents: 5 (VRS providers) will include the additional information in their monthly reports.

Annual Number of Responses: 60 (5 VRS providers x 1 input of data into each monthly report x 12 monthly reports)

Annual Burden Hours: 30 hours (0.50 hours x 60 responses)

The Commission assumes that respondents will use “in-house” personnel whose pay is comparable to senior level federal employees (GS-14/5) to include within monthly requests for compensation: the call center ID and full street address for each at-home workstation, the CA ID number for each individual handling VRS calls from that workstation, and the location and call center ID of call centers providing supervision for at-home workstations, plus the names of persons responsible for oversight of such workstations.

The Commission estimates that each respondent’s costs to be about \$60.83 per hour to within monthly requests for compensation: the call center ID and full street address for each at-home workstation, the CA ID number for each individual handling VRS calls from that workstation, and the location and call center ID of call centers providing supervision for at-home workstations, plus the names of persons responsible for oversight of such workstations.

Annual In-House Cost: 30 hours x \$60.83 per hour = \$1,824.90

(X) At-home VRS call handling pilot program six-month report.

The Commission estimates that each respondent will require 75 hours to prepare the materials and submit a report covering the first six months of its program, including: a description of the screening process, copies of training materials, copies of written protocols, the total number of CAs handling VRS calls from at-home workstations, the number of 911 calls handled by the at-home workstations, copies of surveys or evaluations taken of CAs concerning their experience using at home-workstations, total number of CAs terminated from the program, total number of complaints, if any, regarding the at-home call handling program or calls handled by at-home CAs, the total number of on-site inspections conducted, a description of the monitoring technology used, copies of reports produced by tracking software, and documentation of costs incurred in the use of at-home workstations. This is a one-time report of which much of the information will be updated from the respondent's initial plan to participate in the pilot program.

Annual Number of Respondents: 5 (VRS providers) will prepare the information for and submit 6-month reports to the Commission, or **2 VRS providers will prepare the information for and submit 6-month reports to the Commission annualized.**

Annual Number of Responses: 5 (1 report x 5 respondents), or **2 reports annualized (rounded)**

Annual Burden Hours: 375 hours (75 hours x 5 responses), or **125 hours annualized**

The Commission assumes that respondents will use "in-house" personnel whose pay is comparable to senior level federal employees (GS-14/5) to prepare the materials and submit a report covering the first six months of its at-home VRS call handling pilot program.

The Commission estimates that each respondent's costs to be about \$60.83 per hour to prepare the materials and submit a report covering the first six months of its at-home VRS call handling pilot program.

Annual In-House Cost: 375 hours x \$60.83 per hour = \$22,811.25, or **\$7,603.75 annualized**

TOTAL ANNUAL BURDENS ARE AS FOLLOWS:

Total Annual Number of Respondents: 135,350

Total Annual Number of Responses: 2,700,180

Total Annual Burden Hours: 534,309

Total Annual "In-House" Costs: \$21,177,518.42

13. The Commission estimates that TRS providers will incur some costs for the following:

(a) Capital/start-up costs associated with the implementation of technological infrastructure to: (i) electronically communicate with the TRS-URD; and (ii) implement the at-home call handling pilot program.

(i) The Commission estimates that the 5 VRS provider respondents will purchase software at up to \$15,000 each to implement electronic communications with the TRS-URD. The Commission further estimates that such software will have a useful life of 10 years.

5 respondents (VRS providers) x \$15,000 / 10 yrs = \$7,500/yr

- (ii) The Commission estimates that the 5 VRS provider respondents will purchase software at up to \$25,000 each to implement monitoring of at-home workstations. The Commission further estimates that such software will have a useful life of 10 years.

5 respondents (VRS providers) x \$25,000 / 10 yrs = \$12,500/yr

- (b) Annual costs (operation and maintenance) associated with record storage facilities for retaining records for: (i) user registration and certification information provided to the TRS-URD; and (ii) data retention required to participate in the at-home call handling pilot program.

- (i) The Commission estimates that the 5 VRS respondents will need to spend \$2,600 per year for additional server space, memory, communications, and backup/recovery service, including maintenance, associated with a requirement to retain records of user registration and certification information provided to the TRS-URD.

5 respondents (VRS providers) x \$2,600 /yr = \$13,000/yr

- (ii) The Commission estimates that the 5 VRS respondents will need to spend \$1,600 per year for additional server space, memory, communications, and backup/recovery service, including maintenance, associated with a requirement to retain records pertaining to at-home workstations used in the at-home call handling pilot program.

5 respondents (VRS providers) x \$1,600 /yr = \$8,000/yr

- (a) Total annualized capital/start-up cost: \$20,000
- (b) Total annual costs (operation and maintenance): \$21,000
- (c) Total annualized cost requested: \$41,000

- 14. The Commission believes that the costs to the Federal government emanating from these new proposed information collections will involve:

- (a) Staff review of each VRS provider's plan indicating its intent to participate in the at-home VRS call handling pilot program and detailing how the provider intends to run its program. The Commission will use staff attorneys at the GS-15/5 level to review this information. The Commission estimates the time to review this information will be approximately 2 hours per provider plan for a total of 10 hours (2 hours x 5 providers x 1 plan per provider). This is a one-time review of information.

10 hours x \$71.56 = \$715.60

- (b) Staff review of the six month reports to be submitted by each VRS provider participating in the at-home VRS call handling pilot program. The Commission will use staff attorneys at the GS-15/5 level to review this information. The Commission estimates the time to review this information will be approximately 2 hours per provider six-month report for a total of 10 hours (2 hours x 5 providers x 1 reports per provider). This is a one-time review of information.

10 hours x \$71.56 = \$715.60

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

- 15. The Commission also has program changes to this information collection resulting from the adoption of the 2017 VRS Improvements Order. Specifically, the Commission has added new information collection requirements, along with revising existing information collection requirements. These program changes are as follows: the total annual number of responses has decreased by -7,481,423

responses, the total annual burden hours has decreased by -12,608 hours; and the total annual cost burden has increased by + \$41,000.

16. There are no plans to publish the results of the collection of information.
17. The Commission is not seeking approval not to display the expiration date for OMB approval of these collections of information.
18. There are not exceptions to Certification Statement.

B. Collections of Information Employing Statistical Methods:

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