

**Captioned Telephone Declaratory Ruling; Two-Line Captioned Telephone Order; IP CTS Declaratory Ruling; and IP CTS Reform Order, CG Docket Nos. 13-24 and 03-123**

**SUPPORTING STATEMENT**

**A. Justification:**

1. The Americans with Disabilities Act of 1990 (ADA), Public Law 101-336, 104 Stat. 327, 366-69, was enacted on July 26, 1990.

(a) The purposes of the ADA are:

- (i) to provide a clear and comprehensive national mandate to end discrimination against individuals with disabilities and to bring persons with disabilities into the economic and social mainstream of American life;
  - (ii) to provide enforceable standards addressing discrimination against individuals with disabilities; and
  - (iii) to ensure that the Federal government plays a central role in enforcing these standards on behalf of individuals with disabilities.
- (b) Title IV of the ADA adds section 225 to the Communications Act of 1934 (Act) which directs the Commission to promulgate regulations that require all domestic telephone common carriers to provide telecommunications relay services (TRS).<sup>1</sup>
- (c) 47 CFR Part 64, Subpart F implements certain provisions of the ADA pertaining to TRS. It contains the operational, technical, and functional standards required of all TRS providers and the procedures for state certification.
- (d) The Commission has noted that the overall purpose of section 225, which is to “ensure that interstate and intrastate [TRS] are available, to the extent possible and in the most efficient manner, to hearing-impaired and speech-impaired individuals in the United States.”<sup>2</sup>
- (e) The Commission has further noted that section 225, consistent with section 7(a) of the Act, requires that the rules the Commission prescribes to implement section 225 encourage “the

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<sup>1</sup> The Communications Act of 1934, as amended, defines telecommunications relay services (TRS) as:

telephone transmission services that provide the ability for an individual who is deaf, hard of hearing, deaf-blind, or who has a speech disability to engage in communication 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) (as amended by the Twenty-First Century Communications and Video Accessibility Act of 2010 (CVAA), Pub. L. No. 111-260, § 103(b), 124 Stat. 2751, 2755 (2010); Pub. L. No. 111-265 (technical amendments to CVAA)). The Interstate TRS Fund compensates eligible providers of interstate TRS and Internet-based TRS (iTRS) for their reasonable costs of providing these services. See 47 C.F.R. § 64.604(c)(5)(iii).

<sup>2</sup> 47 U.S.C. § 225(b)(1).

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use of existing technology and not discourage or impair the development of improved technology.”

- (f) The Commission has also concluded that the functional equivalency standard requires that those technological services currently offered to non-disabled persons should also be available to persons with disabilities, if it is technologically feasible to do so.

The purpose of this submission is to extend currently approved collections for the one-line and two-line captioned telephone service (CTS) and Internet Protocol captioned telephone service (IP CTS) rules and update the estimates of existing burdens that were included in the January 2015 Paperwork Reduction Act (PRA) submission to the Office of Management and Budget (OMB).

***History:***

On August 1, 2003, the Commission released *Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities*, Declaratory Ruling, 18 FCC Rcd 16121 (2003) (*Captioned Telephone Declaratory Ruling*). The Commission concluded that *one-line* CTS is a type of TRS, and that eligible providers of such services are eligible to receive compensation in accordance with section 225 of the Communications Act.<sup>3</sup>

On July 19, 2005, the Commission released *Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities*, Report and Order, 20 FCC Rcd 13195 (2005) (*Two-Line Captioned Telephone Order*). The Commission concluded that two-line CTS, like one-line CTS, is a type of TRS eligible for compensation from the Interstate TRS Fund (TRS Fund or Fund).

On August 14, 2006, the Commission released *Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities*, Order, 21 FCC Rcd 9147 (2006) (*2006 Captioned Telephone Waiver Order*). The Commission waived certain TRS mandatory minimum standards for captioned telephone relay service, a form of TRS.

On January 11, 2007, the Commission released *Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities*, Declaratory Ruling, 22 FCC Rcd 379 (2007) (*IP CTS Declaratory Ruling*). The Commission concluded that IP CTS is a type of TRS, and providers of such services are eligible to receive compensation when offered in compliance with the applicable TRS mandatory minimum standards. In addition, the Commission clarified that certain mandatory minimum standards did not apply to IP CTS.

On August 26, 2013, the Commission issued *Misuse of Internet Protocol (IP) Captioned Telephone Service; Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities*, Report Order and Further Notice of Proposed Rulemaking, 28 FCC Rcd 13420 (2013) (*IP CTS Reform Order*), to regulate practices relating to the marketing of IP CTS, impose certain requirements for the provision of this service, and mandate registration and certification of IP CTS users.

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<sup>3</sup> *Captioned Telephone Declaratory Ruling*, 18 FCC Rcd at 16121, para. 1.

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- (a) In the *IP CTS Reform Order*, the Commission adopted user registration and certification requirements that are codified at 47 CFR § 64.604(c)(9). In order to be eligible for compensation from the Fund, the *IP CTS Reform Order* requires providers to register each new IP CTS user. As part of the registration process, each provider must obtain from each user a self-certification that the user (1) has a hearing loss that necessitates use of captioned telephone service; (2) understands that captions on captioned telephone service are provided by a live communications assistant who listens to the other party on the line and provides the text on the captioned phone; (3) understands that the cost of captioning each Internet protocol captioned telephone call is funded through a federal program; and (4) will not permit, to the best of the consumer's ability, persons who have not been registered to use Internet protocol captioned telephone service to make captioned telephone calls on the consumer's registered IP Captioned telephone service or device. This self-certification must be made on a form separate from any other user agreement and be separately signed, under penalty of perjury.
- (b) The *IP CTS Reform Order* also requires providers to maintain all documents relating to user registration and certification in a confidential manner for a period of five years after the consumer ceases to obtain service from the provider.
- (c) For applicants seeking certification as IP CTS providers, the *IP CTS Reform Order* requires that they submit to the Commission a description of how they will ensure that they do not request or collect payment from the TRS Fund for service to consumers who do not satisfy the registration and certification requirements, and an explanation of how those measures provide such assurance. 47 CFR § 64.606(a)(2)(ii)(F).
- (d) Pursuant to the *IP CTS Reform Order*, each IP CTS provider is required to ensure that its IP CTS equipment and software has affixed in a conspicuous location a label or notification that contains the following brief statement: **FEDERAL LAW PROHIBITS ANYONE BUT REGISTERED USERS WITH HEARING LOSS FROM USING THIS DEVICE WITH THE CAPTIONS ON.** 47 CFR § 64.604(11)(c)(iii).
- (e) For software applications on mobile phones, laptops, tablets, computers or other similar devices, the *IP CTS Reform Order* requires that IP CTS providers ensure that, each time the consumer logs into the application, the required notification language appears in a conspicuous location on the device screen immediately after log-in.
- (f) The *IP CTS Reform Order* requires that records of the provision to consumers of required labels, as well as instructions for existing equipment, be maintained for a minimum of five years after the consumer ceases to obtain service from the provider. 47 CFR § 64.604(c)(11)(iv).

These information collections do not affect individuals or households, and thus, there are no impacts under the Privacy Act. However:

- (a) Information that is related to individuals is collected by third parties—IP CTS providers; and

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(b) The Commission has no direct involvement in the collection of this information on individuals.<sup>4</sup>

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

2. The Commission's rules require each IP CTS provider to maintain a consumer complaint log that must be submitted to the Commission annually. *See* 47 CFR § 64.604(c)(1)(i), (ii). This requirement has minimal, if any, economic impact on TRS providers because it merely requires the submission of an annual summary of the complaint log to the Commission.

The *IP CTS Reform Order* imposes registration and certification requirements for new users and requires applicants for certification to be qualified as IP CTS providers to describe how the applicants will ensure that they do not request or collect payment for service to consumers who do not satisfy the registration and certification requirements. The *IP CTS Reform Order* also places labeling requirements on IP CTS providers. In addition, the *IP CTS Reform Order* requires maintenance of records of these requirements.

- (a) The registration and certification requirements, set forth in 47 CFR § 64.604(c)(9), are to ensure that IP CTS providers are providing service only to individuals who have a hearing loss that necessitates use of the service as required by section 225 of the Act. In particular, section 225(a)(3) defines TRS as “telephone transmission services that provide the ability for an individual who is deaf, hard of hearing, deaf-blind, or who has a speech disability to engage in communication by wire or radio with one or more individuals. . . .” 47 U.S.C. § 225(a)(3).
- (b) As part of the section 64.604(c)(9) requirements, providers are required to obtain from new IP CTS consumers self-certification of hearing loss necessitating the use of IP CTS and their understanding of the IP CTS program. IP CTS providers are required to maintain records of these registration and certification requirements for five years after the consumer ceases to obtain service from the provider. This registration, certification and recordkeeping is necessary to ensure that Fund expenditures are made only on behalf of individuals who have a hearing loss that necessitates use of the service, thereby preventing waste and abuse of the Fund that add costs to the Fund, which are ultimately borne by the general public using interstate telecommunications and voice over Internet protocol (VoIP) services.
- (c) The provider certification application process requirement in section 64.606(a)(2)(ii)(F) of the rules provides additional assurance that providers approved for reimbursement will have the means to ensure that Fund expenditures are made only on behalf of individuals who have a hearing loss that necessitates use of the service, thereby preventing waste and abuse of the Fund that add costs to the Fund, which are ultimately borne by the general

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<sup>4</sup> Although the FCC has no direct involvement in the collection of this information on individuals or households, 47 CFR § 64.604(c)(9)(x) requires that IP CTS providers maintain the confidentiality of the documentation of hearing loss.

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public using interstate telecommunications and voice over Internet protocol (VoIP) services.

- (d) As a part of the section 64.604(c)(11) equipment requirements, providers are required to provide labeling on all new equipment, software, and mobile applications to notify potential users of restrictions on the use of captioning by ineligible persons. Providers must maintain records of this label distribution for a period of five years after the consumer ceases to obtain service from the provider. Again, this is necessary to ensure that Fund expenditures are made only on behalf of individuals who have a hearing loss that necessitates use of the service, thereby preventing waste and abuse of the Fund.
3. At this time, the Commission is not considering the use of improved information technology. The cost of implementing new information technology outweighs its benefits because there are currently only five respondents (the five IP CTS providers) that will be required to provide information directly to the Commission. Consumers affected by this information collection will be providing information to the IP CTS providers, and not to the Commission. The IP CTS providers are required to maintain complaint logs with their internal information technology. The IP CTS providers are free to set up their own systems, which may include improved information technology, to obtain registration and certification information.
  4. The information is not duplicated elsewhere. No similar information is available.
  5. There are currently only five entities providing IP CTS. Two of these five entities are small entities. In the *IP CTS Reform Order*, the Commission attached a Final Regulatory Flexibility Certification (FRFC), which provided an analysis of the economic impact of each of the new rules on small entities and certified that the requirements of the *IP CTS Reform Order* will not have a significant economic impact on a substantial number of small entities.
  6. The Commission's rules require IP CTS providers to file annual summaries of consumer complaint logs with the Commission. The complaint log summaries must indicate the number of complaints for the 12-month period ending May 31. If such an information collection is not completed, IP CTS providers will not be eligible to receive compensation from the Interstate TRS Fund.

The *IP CTS Reform Order* requires certain information collections, distribution and maintenance, including:

- (a) the collection of certain registration and eligibility certification information from new users;
- (b) maintenance, in a confidential manner, of the registration and certification information for five years after the consumer ceases to obtain service from the provider;
- (c) distribution of labeling information on new equipment and software and advising consumers of the restrictions on the use of IP CTS to registered users;
- (d) maintenance of records as to distribution of equipment labels; and

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- (e) collection of assurances from applicants for certification to be eligible to be IP CTS providers as to how they will ensure that they do not request or collect payment from the TRS Fund for service to consumers who do not satisfy the registration and certification requirements, and an explanation of how those measures provide such assurance.

The collections of information and recordkeeping requirements are necessary. The Commission must be able to easily confirm that only eligible users are receiving IP CTS, to ensure that Fund expenditures are made only on behalf of individuals who have a hearing loss that necessitates use of the service. The Commission must also be assured that users and non-eligible individuals understand that use of IP CTS is restricted to registered users. Without such information and recordkeeping requirements, the Commission would be limited in its ability to prevent waste and abuse of the Fund. This would add costs to the Fund, which are ultimately borne by the general public using interstate telecommunications and voice over Internet protocol (VoIP) services.

- 7. The collection is not being conducted in any manner inconsistent with the guideline of 5 CFR § 1320.5 (d)(1).
- 8. The Commission published a notice in the *Federal Register* pursuant to 5 CFR §1320.8(d) on November 28, 2017 (82 FR 56239) seeking comments from the public on the information collection requirements contained in this supporting statement. No comments were received.
- 9. The Commission does not anticipate providing any payment or gift to respondents.
- 10. The Commission sets annual interstate TRS compensation rates based on cost and demand data submitted by TRS providers.
  - (a) These data, particularly cost data, are:
    - (i) confidential, proprietary data of the individual submitting TRS providers, and
    - (2) protected from disclosure under the Freedom of Information Act (FOIA) and the Commission's rules implementing FOIA.
  - (b) Except as otherwise set out herein, the Commission is not requesting respondents to submit confidential information.
  - (c) If the Commission requests respondents to submit information that the respondents believe is confidential, respondents may request confidential treatment of such information pursuant to section 0.459 of the Commission's rules.
  - (d) Moreover, the Commission requires the Interstate TRS Fund Administrator to keep all data from contributor and TRS providers confidential.
  - (e) The Interstate TRS Fund Administrator shall not disclose such data in company specific form unless directed to do so by the Commission.

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As to the collections required by the *IP CTS Reform Order*, confidential information that is related to individuals is collected by third parties - IP CTS providers - and the Commission has no direct involvement in the collection of this information on individuals. Moreover, section 64.604(c)(9)(x) requires that IP CTS providers maintain the confidentiality of the registration and certification information that they obtain, as well as the content of such information, except as required by law.

11. There are no questions of a sensitive nature with respect to the information collected.
12. The following represents the estimates of hour burden of the collection of information affected by the *Captioned Telephone Declaratory Ruling, Two-Line Captioned Telephone Order, IP CTS Declaratory Ruling, and IP CTS Reform Order*:

**Captioned Telephone Declaratory Ruling, Two-Line Captioned Telephone Order, and IP CTS Declaratory Ruling**

In the *Captioned Telephone Declaratory Ruling*, the Commission concluded that one-line CTS is a type of TRS eligible for compensation from the Interstate TRS Fund, in the *Two-Line Captioned Telephone Order*, the Commission concluded that two-line CTS is a type of TRS eligible for compensation from the Interstate TRS Fund, and in the *IP CTS Declaratory Ruling*, the Commission concluded that IP CTS is a type of TRS eligible for compensation from the Interstate TRS Fund.

The Commission estimates that the 5 providers currently offering one-line CTS, two-line CTS, and IP CTS,<sup>5</sup> plus up to 5 new providers of IP CTS, for an estimated total of 10 providers, will each maintain a log of consumer complaints and file a summary of the complaint log with the Commission.

This process will be done “annually” and will require approximately 8 hours to complete.

10 respondents x 1/compliant log submission = 10 responses

10 respondents x 8 hours/maintain consumer complaint logs = 80 hours

The Commission estimates that respondents will utilize “in-house” personnel whose pay is comparable to mid-to-senior level federal employee (GS-15/5), to maintain consumer complaint log submissions. The Commission estimates respondents cost to be about \$71.56 per hour to complete.

10 respondents x 1/complaint log submission x 8 hours/maintain consumer complaint log submission x \$71.56 = \$5,724.48

**Captioned Telephone Declaratory Ruling, Two-Line Captioned Telephone Order, and IP CTS Declaratory Ruling Totals are as follows:**

<sup>5</sup> Hamilton and Sprint each provide one-line CTS, two-line CTS, and IP CTS. ClearCaptions, Sorenson (through its wholly-owned subsidiary CaptionCall), and InnoCaption each provide IP CTS.

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Total annual number of respondents: 10

Total number of responses: 10

Total annual burden hours: 80 hours

Total “in house” costs: \$5,724.80

**IP CTS Reform Order**

In the *IP CTS Reform Order*, the Commission adopted section 64.604(c)(9) of the rules, which requires that to be eligible to receive IP CTS, a new consumer must self-certify that the consumer has a hearing loss that necessitates IP CTS to communicate when using the telephone.

**A. IP CTS New Consumer Registration and Self Certification**

The Commission estimates that approximately 5,000 new IP CTS consumers will be added per month. Thus, the Commission estimates that a total of 10 IP CTS providers will be registering, collecting, and maintaining self-certifications from approximately 60,000 new users collectively (annually).

1. IP CTS Providers: New Consumer Registration/Certification

The Commission estimates that each IP CTS provider will spend approximately 30 minutes (.50 hour) collecting, filing, and maintaining the registration and certification information from each new IP CTS consumer. The Commission further estimates that each provider will utilize personnel whose pay is comparable to mid-level federal employees—GS-9/Step 5 level (\$29.85/hour) to collect such information. This is a monthly requirement.

**Annual Number of Respondents: 10 Respondents**

10 IP CTS providers

**Annualized Number of Responses: 60,000**

5,000 responses x 12 month = 60,000

6,000 responses per respondent on average

**Annualized Burden Hours: 30,000 burden hours for all 10 IP CTS providers**

60,000 responses x .50 hour = 30,000

**Annualized “In-House” Cost: \$895,500**

30,000 hours x \$29.85 = \$895,500 total cost to all 10 IP CTS providers

2. New Consumers: Registration and Self-Certification

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The Commission estimates that each consumer will spend on average approximately 1 hour to complete the self-certification form and register for service. This is an ongoing requirement.

**Annualized Number of Respondents: 60,000 consumers**  
**5,000 consumers x 12 months = 60,000**

**Annualized Number of Responses: 60,000**  
**60,000 consumers x 1/self-certification form = 60,000**

**Annualized Burden Hours: 60,000 hours**  
 60,000 respondents x 1 hour/respondent

**Annualized “In-House” Cost: No cost is attributed to such consumer burden hours.**

**IP CTS New Consumer Registration and Certification Totals are as follows:**

**Total Annualized Number of Respondents: 60,010 Respondents**  
 IP CTS Providers: 10  
 New Consumer Respondents: 60,000

**Total Annualized Number of Responses: 120,000 Responses**

IP CTS Provider Registration and Certification Collections: 60,000  
 Consumer Registration/Certifications: 60,000

**Total Annualized Burden Hours: 90,000 hours**

IP CTS Provider Registration and Certification Collections: 30,000  
 Consumer Registrations/Certifications: 60,000

**Total Annualized “In House” Costs: \$895,500**

IP CTS Provider Registration and Certification Collections: \$895,500  
 New Consumers: \$0

**B. IP CTS Labeling Requirement**

In the *IP CTS Reform Order*, the Commission adopted sections 64.604(c)(11)(iii) and (iv) of the rules, adding labeling and notification requirements for new equipment and software. Labels must be printed and adhered to new IP CTS equipment and notifications must appear on the device screen each time the consumer logs into IP CTS software. In addition, records must be maintained on this label disbursement. At this time, an estimated 60,000 new consumers are added annually.

For new equipment and software, the Commission estimates that each IP CTS provider will spend approximately 15 minutes (.25 hour) creating, printing and adhering labels to new equipment and

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creating notifications for new software and preserving records of each such labeling and notifications. The Commission further estimates that each provider will utilize personnel whose pay is comparable to mid-level federal employees—GS-9/Step 5 level (\$29.85/hour) to collect such information. This is an on-going requirement.

**Annual Number of Respondents: 10 Respondents**

10 IP CTS Providers

**Annualized Number of Responses: 60,000 Responses**

6,000 responses per respondent on average

**Annualized Burden Hours: 15,000 Hours**

60,000 responses x .25 hour = 15,000 burden hours for all 10 IP CTS providers

**Annualized “In-House” Cost: \$447,750**

15,000 hours x \$29.85 = \$447,750 total cost to all 10 IP CTS providers

There is no corresponding time required of consumers under this requirement for new equipment.

**C. IP CTS Provider Applicant Assurance**

For applicants seeking certification as IP CTS providers, the *IP CTS Reform Order* requires that they submit to the Commission a description of how they will ensure that they do not request or collect payment from the TRS Fund for service to consumers who do not satisfy the registration and certification requirements, and an explanation of how those measures provide such assurance. 47 CFR § 64.606(a)(2)(ii)(F).

The Commission estimates that each IP CTS provider applicant will spend approximately five hours drafting such description and assurance. The Commission further estimates that each provider will utilize personnel whose pay is comparable to senior-level federal employees—GS-15/Step 5 level (\$71.56/hour) to collect such information. This is an ongoing requirement.

**Annualized Burdens** – Though each respondent will incur the burdens estimated in this section every five years, for purposes of cumulative burden estimates, these estimates are annualized over the three-year period for which the Commission seeks approval for this collection. Because the 5 existing IP CTS providers that have pending certification applications have already submitted this information, these burdens do not affect those providers. The Commission estimates that up to 5 respondents will submit applications for certification over the next 3 years.<sup>6</sup> Therefore:

**Total Annualized Number of Respondents:** 5 Respondents/3 years = **1.66 rounded equals 2**

**Total Annualized Number of Responses:** 5 Responses/3 years = **1.66 rounded equals 2**

**Total Annualized Burden Hours:** 25 Burden Hours/3 years = **8.33 rounded equals 8**

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<sup>6</sup> These are the same 5 respondents that the Commission estimated above that would be applying to be certified as IP CTS providers.

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**Total Annualized “In-House” Cost: \$596.33**

25 hours at \$71.56/hour = \$1,789.00/3 years = **\$596.33**

<b>Rulemakings</b>	<b>Number of Respondents</b>	<b>Number of Responses</b>	<b>Total Burden Hours</b>	<b>Staff Hourly Salary</b>	<b>“In House” Costs</b>
Captioned Telephone Declaratory Ruling, Two-Line Captioned Telephone Order, and IP CTS Declaratory Ruling	10 <sup>7</sup>	10	80	\$71.56	\$5,724.80
IP CTS Reform Order	<b>60,010</b>	<b>180,002</b>	<b>105,008</b>	\$29.85 - \$71.56	<b>\$1,343,846.33</b>
<b>CUMULATIVE TOTALS</b>	<b>60,010<sup>8</sup></b>	<b>180,012</b>	<b>105,088</b>		<b>\$1,349,571.13</b>

13. Under the *IP CTS Declaratory Ruling*, some costs may include maintaining consumer complaint logs. Providers will be reimbursed indirectly when they receive compensation from the Interstate TRS Fund for providing such service. Thus:

(a) Total annualized capital/start-up cost: \$0

(b) Total annual costs (operation and maintenance): \$0

(a) Total annualized cost requested: \$0

Under the *IP CTS Reform Order*, the Commission does not anticipate any capital and start-up costs associated with the information collection after the first year, which has already passed.

Total Annualized Capital and Start-up Costs: None

14. For the *IP CTS Declaratory Ruling*, the Commission will process the annual consumer complaint log summaries filed by current IP CTS providers using Commission staff:

<sup>7</sup> These ten respondents are included in the number of respondents in the *IP CTS Reform Order*.

<sup>8</sup> Overall, there will be a total of 10 provider respondents, of which 5 provider respondents are the estimated number of new providers, and an estimated 60,000 new consumer respondents subject to the information collection requirements contained in this supporting statement, totaling 60,010 respondents for this collection.

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The Commission will use staff attorneys at the GS-15/5 level to process annual consumer complaint log summaries filed by current IP CTS providers. The Commission estimates the time to process each consumer complaint log to be approximately 2 hours.

On average, the Commission estimates that it will receive approximately 10 consumer complaint log summaries annually, thus:

10 summaries x 2 hours/processing reports and logs x \$73.20 = **\$1,464.00**

**Annual Cost to Federal Government = \$1,464.00**

15. The Commission has re-evaluated the information collection requirements contained in this document and makes the following program changes: (1) to eliminate the redundancy of complaint log submissions, the Commission has removed this requirement from the Two-Line Captioned Telephone Order and consolidated this requirement with the IP CTS Declaratory Ruling. In sum, the program changes to OMB's inventory are as follows: -112,000 respondents, from 148,006 to 36,006 respondents, -448,003 annual number of responses, from 556,010 to 108,007 annual number of responses, and -336,024 annual burden hours, from 399,072 to 63,048 annual burden hours, and -\$1,680,000 annual cost, from \$1,680,000 to \$0 annual cost.

Based on data submitted since the last submission, the Commission makes the following adjustments to this information collection: +24,004 respondents, from 36,006 to 60,010 respondents, +72,005 annual number of responses, from 108,007 to 180,012 annual number of responses, and +42,040 annual burden hours, from 63,048 to 105,088 annual burden hours.

16. The results of this information collection will not be published.
17. The Commission is not seeking approval not to display the expiration date for OMB approval of these information collection(s) because the collection(s) do not include a form number.
18. There are no exceptions to the Certification Statement.

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

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