

**SUPPORTING STATEMENT****A. Justification**

1. On May 9, 2019, the Federal Communications Commission (FCC or 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*, CG Docket Nos. 10-51 and 03-123, Report and Order and Further Notice of Proposed Rulemaking, 34 FCC Rcd 3396 (2019) (*2019 VRS Program Management Order*). In that Order, the Commission took steps to: (1) enable direct video calling (DVC); and (2) facilitate video relay service (VRS)<sup>1</sup> call validation; and (3) provide for the registration of enterprise and public videophones, while protecting the VRS program against waste, fraud and abuse.

On January 30, 2020, 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*, CG Docket Nos. 10-51 and 03-123, Report and Order, 35 FCC Rcd 831 (2020) (*VRS At-Home Call Handling Order*). In that Order, the Commission converted the VRS at-home call handling pilot program into a permanent one.

On August 1, 2019, the Commission adopted *Implementing Kari's Law and Section 506 of RAY BAUM's Act; Inquiry Concerning 911 Access, Routing, and Location in Enterprise Communications Systems; Amending the Definition of Interconnected VoIP Service in Section 9.3 of the Commission's Rules*, PS Docket Nos. 18-261 and 17-239 and GN Docket No. 11-117, Report and Order, 34 FCC Rcd 6607 (2019) (*MLTS 911 and Dispatchable Location Order*). In that Order, the Commission amended its rules to implement Kari's Law and Section 506 of RAY BAUM'S Act. Specifically, VRS, Internet Protocol (IP) Relay, and covered IP Captioned Telephone Service (IP CTS) providers must provide automated dispatchable location with each 911 call for fixed services and if technically feasible for non-fixed services.

The purpose of this Paperwork Reduction Act (PRA) submission is to: (1) consolidate the information collections contained in (i) OMB Control Number 3060-1089 related to the telephone numbering system and enhanced 911 (E911) requirements for Internet-based TRS (iTRS) providers, (ii) OMB Control Number 3060-1150 for the registration and certification of TRS providers,<sup>2</sup> and (iii) OMB Control Number 3060-1201 relating to various VRS and iTRS program management requirements; (2) to add the collections adopted in the *2019 VRS Program Management Order*, the *VRS At-Home Call Handling Order*, and the *MLTS 911 and Dispatchable Location Order*; and (3) update the estimates of existing burdens.

**History:**

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

---

<sup>1</sup> See *infra* at 2 for the definition of VRS.

<sup>2</sup> TRS is a telephone transmission service that provides the 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 CAs who transliterate or interpret conversations between two or more end users of TRS. 47 CFR § 64.604(a)(10).

**Structure and Practices of the Video Relay Service Program; Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities, CG Docket Nos. 10-51 & 03-123**

- The Commission ensures that TRS is available, to the extent possible and in the most efficient manner, to persons with hearing or speech disabilities in the United States;<sup>3</sup> and
- 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.<sup>4</sup>

In 1991, pursuant to section 225 of the Act, the Commission adopted rules to require the nationwide provision of TRS.<sup>5</sup> At that time, TRS primarily was provided by use of text telephones (TTYs) and the public switched telephone network (PSTN).<sup>6</sup> As consumers began to use the Internet, TRS expanded to include the following forms of iTRS:

- VRS, which allows people with hearing or speech disabilities who use sign language to communicate with voice telephone users through video equipment. The video link allows the CA to view and interpret the party's signed conversation and relay the conversation back and forth with a voice caller.<sup>7</sup> As a result, the conversation between the two parties takes place in near real time.
- Internet Protocol Relay (IP Relay), which permits an individual with a hearing or speech disability to communicate in text using an IP-enabled device via the Internet, rather than using a text telephone (TTY) and the PSTN.<sup>8</sup>
- Internet Protocol Captioned Telephone Service (IP CTS), which permits an individual who can speak but who has difficulty hearing over the telephone to use a telephone and an IP-enabled device via the Internet to simultaneously listen to the other party and read captions of what the other party is saying. The connection carrying the captions between the relay service provider and the relay service user is via the Internet.<sup>9</sup>

**a. State and Federal Relay Program Certification<sup>10</sup>**

From 1991 through 2013, the Commission released four orders adopting rules for state and federal TRS programs to apply for initial certification and renewal of the certification.

---

<sup>3</sup> 47 U.S.C. § 225(b)(1).

<sup>4</sup> 47 U.S.C. § 225(a)(3).

<sup>5</sup> *Telecommunications Services for Individuals with Hearing and Speech Disabilities, and the Americans with Disabilities Act of 1990*, CG Docket No. 90-571, Report and Order and Request for Comments, 6 FCC Rcd 4657 (1991) (1991 TRS Implementation Order).

<sup>6</sup> See *id.* at 4658, paras. 6, 8 (referring to TTYs as text telephones (TTs)); 47 CFR § 64.601(40) (definition of TTY).

<sup>7</sup> See 47 CFR § 64.601(47) (definition of VRS); see also *Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities*, CC Docket No. 98-67, Report and Order and Further Notice of Proposed Rulemaking, 15 FCC Rcd 5140 (2000).

<sup>8</sup> See 47 CFR § 64.601(20) (definition of IP Relay).

<sup>9</sup> See 47 CFR § 64.601(19) (definition of IP CTS).

<sup>10</sup> The information collections associated with these certification and reporting requirements were originally in OMB Control Number 3060-1150.

**Structure and Practices of the Video Relay Service Program; Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities, CG Docket Nos. 10-51 & 03-123**

- In the *1991 TRS Implementation Order* (document FCC 91-213), the Commission adopted rules governing the TRS program and procedures for each state TRS program<sup>11</sup> to apply for initial Commission certification and renewal of the Commission's certification.<sup>12</sup>
- On July 28, 2011, the Commission released the *VRS Certification Order* (document FCC 11-118) adopting a new modified certification process for 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.<sup>13</sup>

Pursuant to the *VRS Certification Order*, the Commission requires each iTRS provider to obtain certification from the Commission in order to be eligible to receive compensation from the Fund; requires each VRS applicant for Commission certification to lease, license or own, as well as operate, essential facilities associated with TRS call centers and to employ CAs to staff those centers as of the date of the application; and requires each iTRS applicant for certification to submit specific types of documentary evidence of its ability to comply with all of the Commission's rules. The Commission also adopted rules governing on-site visits by Commission staff to the premises of applicants for certification and iTRS providers after they are certified, and revised the Commission's rules governing renewal applications, annual compliance reports, and notifications of substantive iTRS program changes filed by certified providers. In addition, in the *VRS Certification Order*, the Commission requires prior approval and notifications to consumers of voluntary interruptions of VRS service of 30 minutes or longer, and notification to the Commission of all involuntary interruptions of iTRS service.

Section 64.606(g) of the Commission's rules requires iTRS providers to file annual reports demonstrating that they are in compliance with section 64.604 of the rules. The *VRS Certification Order* includes an interim rule requiring all applicants and providers of iTRS to certify, under penalty of perjury, that their certification applications and annual compliance reports are truthful, accurate, and complete, and to include in their annual reports updates to the information and documentation that was submitted with their applications for certification.

- On October 17, 2011, the Commission released the *VRS Certification Reconsideration Order* (document FCC 11-155),<sup>14</sup> modifying the documentation that iTRS providers must include in their applications for certification.
- In the *2013 VRS Reform Order* (document FCC 13-82), the Commission made permanent the interim rule adopted in the *VRS Certification Order* requiring all applicants and providers of

---

<sup>11</sup> Unless otherwise stated, references to state TRS programs will include the 50 states and 6 territories that may have TRS programs.

<sup>12</sup> *1991 TRS Implementation Order*, 6 FCC Rcd at 4664-65, paras. 36-38.

<sup>13</sup> *Structure and Practices of the Video Relay Service Program*, CG Docket No. 10-51, Second Report and Order and Order, 26 FCC Rcd 10898 (2011) (*VRS Certification Order*).

<sup>14</sup> *Structure and Practices of the Video Relay Service Program*, CG Docket No. 10-51, Memorandum Opinion and Order, Order, and Further Notice of Proposed Rulemaking, 26 FCC Rcd 14895 (2011) (*VRS Certification Reconsideration Order*).

**Structure and Practices of the Video Relay Service Program; Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities, CG Docket Nos. 10-51 & 03-123**

iTRS to certify, under penalty of perjury, that their certification applications and annual compliance reports are truthful, accurate, and complete.<sup>15</sup>

The *1991 TRS Implementation Order*, the *VRS Certification Order*, the *VRS Certification Reconsideration Order*, and the *2013 VRS Reform Order* contain the following information collection requirements:

**(1) State Relay Program Certification Applications**

Section 64.606(a)(1), (b)(1) and (c)(1) of the Commission's rules requires that the documentation for each application and renewal application for certification of a state TRS program be submitted in narrative form, and clearly describe the state program and the procedures and remedies for enforcing the state program requirements. The Commission shall certify the state program if the Commission determines that the documentation:

- Establishes that the state program meets or exceeds the operational, technical, and functional minimum standards contained in section 64.604 of the Commission's rules;
- Establishes that the state program makes available adequate procedures for enforcing the state program requirements as well as informational materials on state and Commission complaint procedures; and
- Establishes that the state program does not conflict with federal law where the state program exceeds minimum standards.

**(2) Internet-Based TRS Provider Certification Applications**

Section 64.606(a)(2), (b)(2) and (c)(2) of the Commission's rules requires that an applicant for certification or renewal of certification to provide iTRS must include in its application:

- (a) Full and detailed information that shows its ability to comply with the Commission's rules. Applicants must provide a description of the forms of iTRS to be provided and a detailed description of how the applicant will meet all non-waived mandatory minimum standards applicable to each form of iTRS offered, including documentary and other evidence. In the case of VRS, such documentary and other evidence must demonstrate that the applicant leases, licenses or has acquired its own facilities; operates such facilities associated with TRS call centers; and employs CAs, on a full- or part-time basis, to staff such call centers as of the date of the application.
- (b) A description of the provider's complaint procedures.
- (c) A statement that the provider will file annual compliance reports demonstrating continued compliance with the Commission's rules.
- (d) A certification from the chief executive officer (CEO), chief financial officer (CFO), or other senior executive with first-hand knowledge of the accuracy and completeness of the information provided that all application information required under the Commission's rules and orders has been provided, and that all statements of fact, as well as all documentation contained in the application submission, are true, accurate, and complete.

**(3) Notification of Service Cessation**

---

<sup>15</sup> *Structure and Practices of the Video Relay Service Program; Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities, CG Docket Nos. 10-51 and 03-123, Report and Order and Further Notice of Proposed Rulemaking, 28 FCC Rcd 8618 (2013) (2013 VRS Reform Order)*.

The VRS *Certification Order* requires that a provider applying for certification give its customers at least 30 days' notice that the provider will no longer provide service if the Commission determines that the applicant's certification application does not qualify for certification under section 64.606(a) (2) of the Commission's rules.<sup>16</sup>

#### **(4) Suspension or Revocation Proceeding**

Section 64.606(e) of the Commission's rules provides for suspension or revocation of a state relay program's or an iTRS provider's certification if after notice and an opportunity to be heard, the Commission determines that such certification is no longer warranted. The Commission may require submission of documentation demonstrating ongoing compliance with the Commission's rules.

#### **(5) Notification of Substantive Change**

Section 64.606(f) of the Commission's rules requires state relay programs and VRS and IP Relay providers to notify the Commission of substantive changes to their TRS programs within 60 days of when they occur, and to certify that they continue to meet the Commission's minimum standards after implementing the change.

#### **(6) Submission of Annual Report and Compliance Plan**

- (a) Section 64.606(g)(1)-(2) of the Commission's rules requires each iTRS provider to submit an annual report demonstrating that it is in compliance with section 64.604 of the Commission's rules. The report must update the information included in its certification application and include updated documentation and a summary of the updates, or certify that there are no changes to the information and documentation since the last application for certification or renewal of the last annual report. The CEO, CFO, or other senior executive with first-hand knowledge of the accuracy and completeness of the information provided must certify that all information required under the Commission's rules and orders has been provided, and that all statements of fact and all documentation contained in the report are true, accurate, and complete.
- (b) In addition, section 64.606(g)(3) of the Commission's rules requires VRS providers to include with their annual reports a compliance plan describing the provider's policies, procedures, and practices for complying with the requirements of section 64.604(c)(13), which prohibits VRS providers from engaging in any practice that causes or encourages, or that the provider knows or has reason to know will cause or encourage false or unverified claims for compensation, unauthorized use of VRS, the making of VRS calls that would not otherwise be made, or the use of VRS by persons who do not need the service. These plans shall include a description of audit processes used to ensure the accuracy and completeness of the minutes submitted to the TRS Fund administrator and a description of all policies and practices that the provider follows to prevent waste, fraud and abuse of the TRS Fund. Pursuant to section 64.603(g)(4), if the Commission determines that the compliance plan is inadequate, the Commission will direct the VRS provider to submit an amended compliance plan.

#### **(7) Service Interruptions**

- (a) Section 64.606(h)(2) of the Commission's rules requires that a VRS provider seeking to voluntarily interrupt service for a period of 30 minutes or more first obtain Commission

---

<sup>16</sup> VRS *Certification Order*, 26 FCC Rcd at 10922, para. 59.

**Structure and Practices of the Video Relay Service Program; Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities, CG Docket Nos. 10-51 & 03-123**

authorization by submitting a written request to the Commission's Consumer and Governmental Affairs Bureau at least 60 days prior to any planned service interruption, with detailed information of: (i) its justification for such interruption; (ii) its plan to notify consumers about the impending interruption; and (iii) its plans for resuming service, so as to minimize the impact of such disruption on consumers through a smooth transition to the temporary service being obtained from another provider, and restoration of the VRS provider's service at the completion of such interruption.

- (b) With respect to unforeseen iTRS service interruptions, or in the event of a VRS provider's voluntary service interruption of less than 30 minutes in duration, section 64.606(h)(3) of the Commission's rules requires that the provider submit a written notification to the FCC's Consumer and Governmental Affairs Bureau (CGB) within two business days of the commencement of the service interruption, with an explanation of when and how the provider has restored service or the provider's plan to do so imminently. In the event the provider has not restored service at the time such report is filed, the provider must submit a second report within two business days of the restoration of service with an explanation of when and how the provider has restored service.
- (c) For unforeseen iTRS service interruptions, or in the event of a VRS provider's voluntary service interruption of less than 30 minutes in duration (as discussed above), section 64.606(h)(3) also requires that the provider notify consumers on an accessible website, and ensure that the information is updated in a timely manner.

**b. TRS Numbering Orders<sup>17</sup>**

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

**(1) First Numbering Order**

On June 11, 2008, the Commission adopted the *First Numbering Order* (document FCC 08-151) setting forth rules requiring VRS and IP Relay providers to supply numbering and E911 capabilities to their users by, among other things, integrating VRS and IP Relay users into the ten-digit numbering system known as the North American Numbering Plan (NANP).<sup>18</sup>

To integrate VRS and IP Relay into the NANP, the Order requires VRS and IP Relay providers to collect and maintain the routing information from their registered users and to provision that

---

<sup>17</sup> The information collections associated with these three numbering orders were originally in OMB Control Number 3060-1089.

<sup>18</sup> *Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities; E911 Requirements for IP-Enabled Service Providers*, CG Docket No. 03-123 and WC Docket No. 05-196, Report and Order and Further Notice of Proposed Rulemaking, 23 FCC Rcd 11591 (2008) (*First Numbering Order*).

**Structure and Practices of the Video Relay Service Program; Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities, CG Docket Nos. 10-51 & 03-123**

information to the TRS Numbering Directory, which is a central database that maps each user's telephone number to routing information needed to find that user's device on the Internet.

E911 works by routing emergency calls to the appropriate emergency answering authority over a dedicated, redundant, highly reliable wireline network (the Wireline E911 Network) that is interconnected with, but largely separate from, the public switched telephone network. E911 relies on Automatic Location Information (ALI) databases. Because there previously has been no reliable means for VRS and IP Relay providers to automatically know the physical location of their users, the *First Numbering Order* requires VRS and IP Relay providers to collect and maintain the Registered Location of their registered users and to provision the Registered Location and callback information into, or make that information available through, ALI databases across the country.

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

These information collection requirements are described further below.<sup>19</sup>

**(2) *Second Numbering Order***

On December 19, 2008, the Commission adopted the *Second Numbering Order* (document FCC 08-275),<sup>20</sup> further addressing the duties of VRS and IP Relay providers to supply numbering and E911 capabilities to their users by revising the "User Notification" information collection requirement adopted in the *First Numbering Order* and requiring VRS and IP Relay providers to:

- (i) ascertain the registration status of users who may be registered with another provider;
- (ii) verify the accuracy of user registration information;
- (iii) obtain a self-certification about the user's disability;
- (iv) obtain Commission approval to pass through certain numbering-related costs to their users; and
- (v) ensure the equipment they provide to users will enable another VRS provider to perform all of the functions of a default provider.

These information collection requirements are described further below.<sup>21</sup>

---

<sup>19</sup> Information collections associated with the rules adopted in the *First Numbering Order* were initially approved by OMB on November 14, 2008. *First Numbering Order*, 73 Fed. Reg. 70905 (Nov. 24, 2008) (also announcing effective date of 47 CFR §§ 64.605(a)-(b), 64.611(a)-(c), (f)). 47 CFR § 64.605 has been renumbered as 47 CFR § 9.14.

<sup>20</sup> *Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities; E911 Requirements for IP-Enabled Service Providers*, CG Docket No. 03-123, CC Docket No. 98-67, WC Docket No. 05-196, Second Report and Order and Order on Reconsideration, 24 FCC Rcd 791 (2008) (*Second Numbering Order*).

<sup>21</sup> Information collections associated with the rules adopted in the *Second Numbering Order* were initially approved by OMB on November 23, 2009. *Second Numbering Order*, 75 Fed. Reg. 29914 (May 28, 2010) (also announcing

**(3) *iTRS Toll Free Order***

On August 4, 2011, the Commission adopted the *iTRS Toll Free Order* (document FCC 11-123).<sup>22</sup> The Commission took steps to improve the assignment of telephone numbers associated with iTRS, specifically, VRS and IP Relay, by revising the requirement for VRS and IP Relay providers to collect and maintain the routing information from their registered users, and to provision that information to the TRS Numbering Directory originally adopted in the *First Numbering Order*. The *iTRS Toll Free Order* also further revised the “User Notification” information collection requirements that were established by the *First Numbering Order* and revised by the *Second Numbering Order*. These information collection requirements are described further below.<sup>23</sup>

**(4) Information Collections for the Three Numbering Orders**

The rules adopted in the three numbering orders have the following information collection requirements.

- (i) *Routing Information.* VRS and IP Relay providers must obtain current routing information, including IP addresses or domain names and user names, from their registered users and must maintain such information in their internal databases.
- (ii) *Provision of Routing Information.* VRS and IP Relay providers must provision their registered users’ routing information to the TRS Numbering Directory and must maintain such information in that database.<sup>24</sup> In addition to provisioning their registered users’ routing information to the TRS Numbering Directory and maintaining such information in the database, VRS and IP Relay providers must ensure that the toll free number of a user that is associated with a geographically appropriate NANP number will be associated with the same Uniform Resource Identifier (URI) as that geographically appropriate NANP telephone number.<sup>25</sup>
- (iii) *Registered Location.* VRS and IP Relay providers must obtain from each newly registered user, prior to the initiation of service, the physical location at which the service will be utilized and keep that information in their own databases. If the VRS or IP Relay is capable of being used from more than one location, the providers must offer their registered users one or more methods of updating their physical location, including at least one option that requires use of only the customer premises equipment necessary to access the VRS or IP Relay. Any method utilized must allow a registered user to update his or her Registered Location at will and in a timely manner.<sup>26</sup>

---

the effective date of 47 CFR § 64.605, as amended). 47 CFR § 64.605 has been renumbered as 47 CFR § 9.14.

<sup>22</sup> *Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities et al.*, CG Docket No. 03-123, Report and Order, 26 FCC Rcd 11779 (2011) (*iTRS Toll Free Order*).

<sup>23</sup> Information collections associated with the rules adopted in the *iTRS Toll Free Order* were initially approved by OMB on September 27, 2011. *iTRS Toll Free Order*, 76 Fed. Reg. 72124 (Nov. 22, 2011) (also announcing the effective date of 47 CFR §§ 64.611(e)(2), 64.611(e)(3), 64.611(g)(1)(v)-(vi), 64.613(a)(3), as amended).

<sup>24</sup> This requirement was established by the *First Numbering Order*.

<sup>25</sup> This requirement was added by the *iTRS Toll Free Order*.

<sup>26</sup> These requirements were established by the *First Numbering Order*. In addition, each VRS provider must submit the user’s Registered Location and other user-related information to the TRS User Registration Database (TRS-URD). The information collections and burdens associated with these requirements were originally included in

**Structure and Practices of the Video Relay Service Program; Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities, CG Docket Nos. 10-51 & 03-123**

- (iv) *Provision of Registered Location.* Each VRS and IP Relay provider must place its registered users' Registered Location, the provider's name, and the CA's identification number into, or make that information available through, ALI databases across the country.<sup>27</sup>
- (v) *User Notification.* Every VRS or IP Relay provider must include an advisory on its website and in any promotional materials addressing numbering or E911 services for VRS or IP Relay. At a minimum, the advisory must address the following issues: (1) the process by which VRS or IP Relay users may obtain ten-digit telephone numbers; (2) the portability of ten-digit telephone numbers assigned to VRS or IP Relay users; (3) the process by which persons using VRS or IP Relay may submit, update, and confirm receipt by the provider of their Registered Location information; and (4) an explanation emphasizing the importance of maintaining accurate, up-to-date Registered Location information with the user's default provider in the event that the individual places an emergency call via an Internet-based relay service.<sup>28</sup> In addition, the consumer advisories must explain that: (1) the consumer may obtain a telephone number from, and register with, his or her provider of choice; (2) the consumer may change default providers while retaining the same telephone number by porting that number to the new default provider; (3) the consumer may make calls through, and receive calls from, any provider; and (4) the provider cannot condition the ongoing use or possession of equipment, or the receipt of different or upgraded equipment, on the consumer continuing to use the provider as his or her default provider.<sup>29</sup> The consumer advisories must further explain: (1) the process by which a VRS or IP Relay user may acquire a toll free number from a toll free service provider, including contact information for toll free service providers, or the process by which control of a toll free number is transferred from a VRS or IP Relay provider to the user; and (2) the process by which persons holding a toll free number may have that number linked to their ten-digit telephone number in the TRS Numbering Directory.<sup>30</sup>
- (vi) *Affirmative Acknowledgements.* VRS and IP Relay providers must obtain and keep a record of affirmative acknowledgement from each of their registered users of having received and understood the user notification.<sup>31</sup>
- (vii) *Ascertaining Registration Status of VRS or IP Relay User.* Every VRS and IP Relay provider must verify whether a dial-around user is registered with another provider.<sup>32</sup>

---

OMB Control Number 3060-1201.

<sup>27</sup> This requirement was established by the *First Numbering Order*. ALI databases contain location information that is associated with calling numbers that is used to route emergency calls appropriately.

<sup>28</sup> These requirements were established by the *First Numbering Order*.

<sup>29</sup> This requirement was added by the *Second Numbering Order*.

<sup>30</sup> This requirement was added by the *iTRS Toll Free Order*.

<sup>31</sup> This requirement was established by the *First Numbering Order*.

<sup>32</sup> This requirement was established by the *Second Numbering Order*. A "dial-around" user is one who selects and registers with a provider, which serves as the user's default provider for the user's ten-digit NANP number, but who chooses to place a call through another provider. Because there is only one IP Relay provider certified by the Commission, this requirement does not apply to IP Relay at this time and for the foreseeable future.

The provider may do so by requesting a user's ten-digit NANP number and querying the TRS Numbering Directory using that number.

- (viii) *Verifying Registration and Eligibility Information.* Every IP Relay provider must institute procedures to verify the accuracy of registration information, including the consumer's name and mailing address, and VRS and IP Relay providers must obtain from each user a self-certification verifying that the user has a medically recognized hearing or speech disability necessitating their use of TRS.<sup>33</sup>
- (ix) *Commission Approval for the Pass Through of Numbering Costs.* Each VRS or IP Relay provider wishing to pass through certain numbering-related costs to its users must obtain Commission approval to do so.<sup>34</sup>
- (x) *Information Sharing After a Change in Default Providers.* Each VRS provider that provisions equipment to a consumer must make available to other VRS providers enough information about that equipment to enable another VRS provider selected as the consumer's default provider to perform all of the functions of a default provider.<sup>35</sup>

**c. Four VRS Orders<sup>36</sup>**

Between 2011 and 2019, the Commission adopted four orders focusing on VRS.

**(1) 2013 VRS Reform Order**

On June 10, 2013, the Commission released the *2013 VRS Reform Order*,<sup>37</sup> 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.

---

<sup>33</sup> These requirements were established by the *Second Numbering Order*. The certification from the user must contain specific attestations on a separate form, and the VRS provider must submit such certification for each 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. Responsibility for verification of the registration and eligibility information of VRS users has now shifted to the TRS-URD administrator.

<sup>34</sup> This requirement was established by the *Second Numbering Order*.

<sup>35</sup> This requirement was established by the *Second Numbering Order*.

<sup>36</sup> The information collections associated with the *2013 VRS Reform Order* and the *2017 VRS Improvements Order* were originally in OMB Control Number 3060-1201. The information collections associated with the *2019 VRS Program Management Order* and the *VRS At-Home Call Handling Order* appear in this OMB Control Number 3060-1089 for the first time.

<sup>37</sup> *Structure and Practices of the Video Relay Service Program; Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities, CG Docket Nos. 10-51 and 03-123, Report and Order and Further Notice of Proposed Rulemaking, 28 FCC Rcd 8618 (2013) (2013 VRS Reform Order)*.

**Structure and Practices of the Video Relay Service Program; Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities, CG Docket Nos. 10-51 & 03-123**

- (b) 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.
- (c) 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.
- (d) 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).
- (e) 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.
- (f) 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.
- (g) 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, as well as of any user that has neither placed nor received a VRS or point-to-point call in a one-year period.
- (h) The administrator of the TRS-URD shall assign a unique identifier to each user in the TRS-URD.
  - (i) 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.
  - (j) 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.
- (k) 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.
- (l) 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.
- (m) 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.
- (n) 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.

**Structure and Practices of the Video Relay Service Program; Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities, CG Docket Nos. 10-51 & 03-123**

- (o) 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.
- (p) Each TRS provider is required to provide users with 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.
- (q) Each TRS provider is required to maintain for a minimum of three years a record of marketing campaigns that use its customers' CPNI, including a record of all instances where CPNI was disclosed to third parties. Each TRS provider shall establish a supervisory review process regarding the TRS provider's compliance with the rules for outbound marketing situations. Each TRS provider is required to have an officer sign and file with the Commission a compliance certification on an annual basis.
- (s) Each TRS provider is 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. Each TRS provider is 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.

**(2) 2017 VRS Improvements Order**

On March 23, 2017, the Commission adopted the *2017 VRS Improvements Order* amending its rules to improve the quality and efficiency of VRS.<sup>38</sup> 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 video calls over the facilities of VRS providers using VRS access technology. Each VRS provider, before assigning iTRS numbers to hearing individuals, must:
  - (i) Obtain the user's full name; residential address; date of birth; and a written certification attesting the user is (1) proficient in sign language, (2) understands that the iTRS number may only be used for point-to-point communications with

---

<sup>38</sup> *Structure and Practices of the Video Relay Service Program; Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities, CG Docket Nos. 10-51 and 03-123, Report and Order, Notice of Inquiry, Further Notice of Proposed Rulemaking, and Order, 32 FCC Rcd 2436 (2017) (2017 VRS Improvements Order).*

registered VRS users, and (3) understands that such iTRS number may not be used to access VRS.

- (ii) 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.
- (iii) Submit to the TRS-URD the user's (1) full name; (2) residential address; (3) date of birth; (4) a copy of the written certification; (5) the assigned ten-digit number; (6) the VRS provider's name and the date of service initiation; and (7) the date on which a ten-digit number was assigned to or removed from the user.
- (iv) Submit to the TRS-URD the date of termination of service upon the termination of service for any hearing point-to-point video user.
- (v) Notify the TRS-URD of the transfer of a hearing point-to-point video user from another VRS provider and obtain and submit a certification from the user.
- (vi) Provide an explanation to hearing point-to-point video users that they will be unable to place emergency calls.

In addition, 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.

Each VRS provider shall also request the administrator of the TRS-URD to remove user information for any hearing point-to-point user that (1) informs its provider that the user no longer wants use of a ten-digit number for point-to-point video service, or (2) for whom the provider receives information that the user is not eligible to use the service.

- (c) 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.
- (d) 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.

### **(3) 2019 VRS Program Management Order**

On May 15, 2019, the Commission released the *2019 VRS Program Management Order*, making further improvements to the structure, efficiency, and quality of the VRS program, reducing the risk of waste, fraud, and abuse, and ensuring that the program makes full use of advances in commercially-available technology. These improvements include the following information collection requirements:

- (a) A default VRS provider for an enterprise or public videophone shall transmit to the TRS-URD the following information for each of its enterprise or public videophones: (1) the default VRS provider's name; (2) the NANP telephone number assigned to the videophone; (3) the name and physical address of the organization, business, or agency where the enterprise or public videophone is located, and the Registered Location of the phone if that is different from the physical address; (4) the specific type of area where the videophone is located within the organization, business, agency, or other entity; (5) the date of initiation of service to the videophone by the default VRS provider; and (6) the name of the individual responsible for compliant use of the videophone, confirmation that

the provider has obtained the required certification, and the date the certification was obtained by the provider.

- (b) VRS providers shall notify the TRS Fund administrator within one business day in the event that a registered enterprise or public videophone is removed or permanently disconnected from VRS.
- (c) Any person seeking to access the TRS Numbering Directory as a Qualified Direct Video Calling (DVC) Entity shall submit an application to the Commission. The Commission shall approve the application if the applicant demonstrates that the applicant has a legitimate need for such access and is aware of its regulatory obligations.
- (d) Authorization to access the TRS Numbering Directory shall terminate: (i) if a Qualified DVC Entity relinquishes its authorization by notifying the Commission; (ii) automatically if one year elapses with no call-routing queries received regarding any of the Qualified DVC Entity's NANP telephone numbers; or (iii) if the Commission determines, after notice to the entity and an opportunity for the entity to contest the proposed termination, that the entity is no longer qualified as described in its application, has materially misrepresented information to the Commission, the TRS Numbering Administrator, or the TRS-URD administrator, or has violated an applicable Commission rule or order or a requirement imposed by authority of the TRS Numbering Administrator or the TRS-URD administrator.
- (e) A Qualified DVC Entity that is granted access to the TRS Numbering Directory shall notify the Commission within 60 days of any material changes to information provided in its application.
- (f) A Qualified DVC Entity shall comply with all relevant rules and obligations applicable to VRS providers' access to the TRS Numbering Directory and the use of numbers provisioned in the TRS Numbering Directory, including, but not limited to, (1) provisioning and maintaining current routing information in the TRS Numbering Directory for each NANP telephone number that it enters in such directory; and (2) protecting customer proprietary network information of any VRS user obtained in accordance with sections 64.5101 *et seq.* of the Commission's rules (TRS Customer Proprietary Network Information).
- (g) For each direct video number to be entered into the TRS Numbering Directory, unless otherwise instructed by the TRS-URD administrator, a Qualified DVC Entity must create an equivalent entry in the TRS-URD.

#### **(4) VRS At-Home Call Handling Order**

On January 31, 2020, the Commission released the *VRS At-Home Call Handling Order*, which amended the Commission's rules to convert the VRS at-home call handling pilot program into a permanent one, thereby allowing CAs to work from home if working for a VRS provider authorized to provide VRS via at-home workstations, subject to the requirements established by the Commission. The following requirements include information collections:

- (a) *Application for certification.* An applicant for VRS certification may request authorization to provide at-home VRS call handling in conjunction with an application for certification to provide VRS and shall include a detailed plan describing how the VRS

provider will ensure compliance with each of the Commission's requirements regarding at-home call handling.

- (b) *Monitoring and oversight obligations.* Each VRS provider shall:
  - (1) Inspection each home workstation and its home environment to confirm their compliance with the at-home call handling rules before activating the workstation for use;
  - (2) Assign a unique workstation identification number (ID) to each VRS home workstation;
  - (3) Equip each home workstation with monitoring technology sufficient to ensure that off-site supervision approximates the level of supervision at the provider's call center and regularly analyze the records and data produced by such monitoring to proactively address possible waste, fraud, and abuse;
  - (4) Keep all records pertaining to home workstations, except records of the content of interpreted conversations, for a minimum of five years; and
  - (5) Conduct random and unannounced inspections of at least five percent (5%) of all home workstations, including their home environments, in each 12-month period.
- (c) *On reports.* Each VRS provider must include with its monthly request for compensation submitted to the TRS Fund administrator, the home workstation 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 call center ID, street address, and name of the supervisor of the call center responsible for oversight of that workstation.
- (d) *Annual reports.* If a VRS provider is authorized to provide at-home call handling, its annual compliance report required by 47 CFR § 64.606(g) shall include the following information:
  - (1) The total number of CAs handling VRS calls from home workstations over the preceding year;
  - (2) The number of 911 calls handled by the provider's home workstations;
  - (3) The total number of complaints, if any, submitted to the provider regarding its at-home call handling program or calls handled by at-home CAs; and
  - (4) A description of any substantive changes in the VRS provider's currently effective at-home call-handling compliance plan.

**d. *MLTS 911 and Dispatchable Location Order***

On August 2, 2019, the Commission released the *MLTS 911 and Dispatchable Location Order* amending the Commission's rules to ensure that the dispatchable location is conveyed to a Public Safety Answering Point (PSAP) with a 911 call, regardless of the technological platform used, including VRS, IP Relay, and IP CTS. Based on the directive in Section 506 of RAY BAUM'S Act to consider rules requiring the conveyance of dispatchable location with 911 calls "regardless of the technological platform used," the Commission adopted dispatchable location requirements that in effect modified the existing information collection requirements applicable to VRS, IP Relay and IP CTS by improving the options for providing accurate location information to PSAPs as part of 911 calls, including from mobile, non-fixed devices. The Commission adopted flexible rules for Internet-

**Structure and Practices of the Video Relay Service Program; Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities, CG Docket Nos. 10-51 & 03-123**

based TRS that largely parallel the rules for fixed and nomadic VoIP, including a longer time frame for providing accurate 911 location information. For non-fixed devices, the record indicated that Internet-based TRS providers continue to rely heavily on Registered Location, but that alternative approaches are increasingly available that could support automated dispatchable location in some instances.

Under the new rules, fixed Internet-based TRS devices must provide automated dispatchable location. For non-fixed devices, the rules allow that when dispatchable location is not technically feasible, Internet-based TRS providers may fall back to Registered Location or provide alternative location information. As a last resort, Internet-based providers may route calls to Emergency Relay Calling Centers after making a good faith effort to obtain location data from all available alternative location sources. The following requirements include information collections:

*E911 Service for VRS and IP Relay.* On or after January 6, 2021 for fixed services, providers of VRS and IP Relay services and covered providers of IP CTS must provide automated dispatchable location with each 911 call to the appropriate PSAP. On or after January 6, 2022 for non-fixed services, providers of VRS and IP Relay services must provide automated dispatchable location, if technically feasible, to the appropriate PSAP. Otherwise, VRS and IP Relay service providers must either provide Registered Location information or alternative location information to the appropriate PSAP; or route the caller to a call center as a last resort.

Dispatchable location means a location delivered to the PSAP with a 911 call that consists of the validated street address of the calling party, plus additional information such as suite, apartment or similar information necessary to adequately identify the location of the calling party. Automated dispatchable location means automatic generation of dispatchable location.

In the non-fixed VRS and IP Relay context, Registered Location information shall meet the following requirements: (1) the service provider has obtained from the customer, prior to the initiation of service, the Registered Location at which the service will first be used, and keep that information in its own database; and (2) the service provider has provided end users one or more methods of updating their Registered Location, including at least one option that requires use only of the internet-based TRS access technology necessary to access VRS or IP Relay. Any method used must allow an end user to update the Registered Location at will and in a timely manner; and if VRS or IP Relay is capable of being used from more than one location, if it is not possible to automatically determine the user's location at the time of the initiation of an emergency call, verify the current location with the user at the beginning of an emergency call.

Alternative location information is location information (which may be coordinate-based) sufficient to identify the caller's civic address and approximate in-building location, including floor level, in large buildings.

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 individual's VRS or IP Relay provider collects the individual's PII, and for VRS users, transmits certain of the individual's PII to 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 that individual's default TRS provider, a third-party independent vendor selected by the Commission's Managing Director and the

**Structure and Practices of the Video Relay Service Program; Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities, CG Docket Nos. 10-51 & 03-123**

Commission. The default TRs provider, 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 Commission's rules and 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)," 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.<sup>39</sup> This 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 the collection is contained in section 225 of the Communications Act, 47 U.S.C. 225. The law was enacted on July 26, 1990, as Title IV of the Americans with Disabilities Act of 1990 (ADA), Pub. L. 101-336, 104 Stat. 327, 366-69, and amended by the Twenty-First Century Communications and Video Accessibility Act of 2010, Pub. L. No. 111-260, § 103(a), 124 Stat. 2751, 2755 (2010) (CVAA); Pub. L. No. 111-265 (technical amendments to CVAA).

2. The utility of the information collections is discussed below.

**a. State and Federal Relay Program Certification**

The 1991 TRS Implementation Order, the VRS Certification Order, the VRS Certification Reconsideration Order, and the 2013 VRS Reform Order adopted mandatory reporting requirements for state relay programs offering traditional TRS, speech-to-speech relay service, and captioned telephone service and for providers and applicants offering and seeking to offer iTRS, such as VRS, IP Relay and IP CTS. The purpose of these requirements is to:

- (1) Ensure that state relay programs comply with the Commission's rules and orders, including the mandatory minimum standards set forth in section 64.604 of the Commission's rules;
- (2) Ensure that the certified providers are qualified to provide iTRS in compliance with the Commission's rules and orders, including the mandatory minimum standards set forth in section 64.604 of the Commission's rules; and
- (3) Determine whether applicants to provide iTRS are eligible to receive compensation from the Interstate TRS Fund.

These requirements also help the Commission and TRS Fund Administrator oversee iTRS in an effective manner; detect and deter the misuse of relay services and the billing of illegitimate minutes to the Fund; minimize waste, fraud and abuse through improved oversight of such providers; and further the Commission's goals of ensuring that iTRS is available to, and used by, the full spectrum of eligible users, encouraging innovation, and efficiently providing service.

**b. Three Numbering Orders**

---

<sup>39</sup> 80 Fed. Reg. 6963 (Feb. 9, 2015).

**Structure and Practices of the Video Relay Service Program; Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities, CG Docket Nos. 10-51 & 03-123**

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

- (1) *Routing Information.* Each VRS or IP Relay provider collects its registered users' routing information from their communications devices so that such routing information can be provisioned into the TRS Numbering Directory.
- (2) *Provision of Routing Information.* A VRS or IP Relay provider provisions its registered users' routing information into the TRS Numbering Directory and ensures that that users' toll free numbers are associated with geographically appropriate NANP numbers and their URIs, so that other providers can access that routing information to complete a call to a particular Internet-based TRS user.
- (3) *Registered Location.* Each VRS or IP Relay provider collects its registered users' Registered Locations and enables users, including users of mobile devices, to update their Registered Location information using the same device used for VRS or IP Relay and by other methods the provider chooses to offer. VRS and IP Relay providers, along with the entity that operates the Wireline E911 Network and public safety officials, use the Registered Location to deliver 911 calls to the appropriate emergency answering point.
- (4) *Provision of Registered Location.* Each VRS or IP Relay provider provisions ALI databases with its registered users' Registered Location information, along with other callback information. The VRS or IP Relay provider, the entity that operates the Wireline E911 Network, and public safety officials can then use this information to facilitate emergency response.
- (5) *User Notification.* Each VRS and IP Relay provider must post advisories on its website and in any promotional materials addressing numbering, toll free numbers, and E911 services for VRS or IP Relay, as applicable, so that customers understand the capabilities, limitations, and obligations of providers, particularly with respect to ten-digit numbering, the ability to make and receive calls through any provider, number portability, the importance of and how to keeping Registered Location information current, and acquiring and using toll free numbers.
- (6) *Affirmative Acknowledgements.* Each VRS and IP Relay provider must obtain and keep a record of affirmative acknowledgement from each of its registered users of having received and understood the user notification to facilitate the Commission's review and, if necessary, enforcement of these rules.
- (7) *Ascertaining Registration Status of VRS or IP Relay User.* A VRS or IP Relay provider may request a user's ten-digit NANP number and query the TRS Numbering Directory using that number to distinguish a new user who has not yet registered from a user who is registered with another provider.<sup>40</sup>
- (8) *Verifying Registration and Eligibility Information.* Each VRS and IP Relay provider must institute procedures to verify the accuracy of registration information and include a disability self-certification to ensure that its services are not used for fraudulent or other purposes not authorized by the statute or by the Commission's rules.

---

<sup>40</sup> Because there is only one IP Relay provider certified by the Commission, this requirement does not apply to IP Relay at this time.

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

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

### **c. Four VRS Orders**

The responses listed below address how, by whom, and the purpose of the information collection requirements adopted in the *2013 VRS Reform Order*, the *2017 VRS Improvements Order*, the *2019 VRS Program Management Order*, and the *VRS At-Home Call Handling Order*.

#### **(1) 2013 VRS Reform Order**

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.

#### **(2) 2017 VRS Improvements Order**

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) 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.
- (b) 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.

**Structure and Practices of the Video Relay Service Program; Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities, CG Docket Nos. 10-51 & 03-123**

(c) 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) 2019 VRS Program Management Order**

The 2019 VRS *Program Management* 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) Each default VRS provider registering enterprise or public videophones will transmit to the TRS-URD information for each of its enterprise or public videophones. Each VRS provider also will inform the TRS Fund administrator whenever a videophone is removed or permanently disconnected. This information is needed to ensure that service to videophones is provided to properly registered videophones, and that the TRS Fund is paying compensation only for videophones in service.
- (b) To become a Qualified DVC Entity, the entity must apply to the Commission. If the application is granted, the Qualified DVC Entity will have access to the TRS Numbering Directory in order to assign ten-digit telephone numbers to customer service call centers to facilitate their receipt of calls from registered VRS users. Such access terminates if the Qualified DVC Entity notifies the Commission that it is relinquishing its authorization; if the associated NANP telephone numbers are not used for direct video customer support purposes for one year; or if the Commission determines that the Qualified DVC Entity is no longer qualified, has misrepresented information to the Commission, the TRS Fund administrator, or the TRS-URD administrator; or has violated a Commission rule or other relevant requirement of the Commission, the TRS Fund administrator, or the TRS-URD administrator. This rule helps to ensure the security of the TRS Numbering Directory by ensuring that only qualified entities can access the TRS Numbering Directory.
- (c) A Qualified DVC Entity that is granted access to the TRS Numbering Directory must notify the Commission within 60 days of any material changes to information provided in its application. This requirement helps to ensure that the TRS Numbering Directory is accessed only by entities that meet the Commission's requirements.
- (d) A Qualified DVC Entity must comply with the relevant rules and obligations applicable to VRS providers' access to the TRS Numbering Directory, and the use of numbers provisioned in the TRS Numbering Directory, including, provisioning and maintaining current routing information in the TRS Numbering Directory for each NANP telephone number that it enters in such directory. This requirement helps to ensure that direct video customer support calls are routed properly.
- (e) In accordance with sections 64.5101-64.5111 of the Commission's rules (TRS CPNI), a Qualified DVC Entity must protect the CPNI of any VRS user communicating with a customer support call center. This requirement ensures that consumers with disabilities who use direct video customer support are given the same assurances of privacy as

**Structure and Practices of the Video Relay Service Program; Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities, CG Docket Nos. 10-51 & 03-123**

consumers with disabilities who use relay services and consumers without disabilities who use voice telephone services.

(f) For each direct video customer support number entered into the TRS Numbering Directory, unless otherwise instructed by the TRS-URD administrator, a Qualified DVC Entity must create an equivalent entry in the TRS-URD. This requirement will enable the TRS-URD administrator and TRS Numbering administrator to confirm that the Qualified DVC Entity has been approved for direct access and will help ensure that the Directory provides an appropriate response to a VRS provider's per-call validation query regarding the customer support telephone number.

**(4) VRS At-Home Call Handling Order**

The records maintained by VRS providers that voluntarily participate in the VRS at-home call handling and the applications and records submitted to FCC and the TRS Fund administrator by these providers are used to ensure that VRS providers have adopted and are adhering to the safeguards that are required to protect against waste, fraud, and abuse. As such, these information collection requirements help ensure the integrity of the TRS Fund.

**d. MLTS 911 and Dispatchable Location Order**

VRS, IP Relay, and covered IP CTS providers will collect the applicable location information, as described above in section 1.d., from their users. Covered IP CTS providers are providers of IP CTS to the extent that the IP CTS provider, itself or through an entity with whom the IP CTS provider contracts, places or routes voice calls to the public switched telephone network. VRS, IP, Relay and covered IP CTS providers transmit the applicable location information to the relevant PSAP, designated statewide default answering point, or appropriate local emergency authority to facilitate 911 service and make such location information available to emergency call handlers, emergency responders, or law enforcement personnel to ascertain a user's location in an emergency situation or for other emergency or law enforcement purposes.

**3. Use of Automated, Electronic, Mechanical, or Other Technological Collection Techniques or Other Forms of Information Technology****a. State and Federal Relay Program Certification**

Applications for certification may be filed electronically via the Commission's Electronic Comment Filing System (ECFS). At this time, the Commission is not considering the use of additional improved information technology for these information collections.

**b. Three Numbering Orders**

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

- (1) *Routing Information*. The Commission expects that a VRS or IP Relay provider's collection of routing information will be automatically done over the Internet.
- (2) *Provision of Routing Information*. VRS and IP Relay providers must provision a registered user's updated routing information to the TRS Numbering Directory by electronic means.
- (3) *Registered Location*. If a VRS or IP Relay provider's service is capable of being used from more than one location, the provider must offer its registered users one or more methods of

updating their Registered Location, including at least one option that requires use only of the customer premises equipment necessary to access the VRS or IP Relay. The Commission expects that many VRS and IP Relay providers will also allow their registered users to update their Registered Location via a webpage.

- (4) *Provision of Registered Location.* VRS and IP Relay providers must use electronic means to provide information in or through ALI databases.
- (5) *User Notification.* Every VRS and IP Relay provider must disseminate the required advisory by electronic means, i.e., on its website. Providers must also include the advisory whenever they disseminate promotional materials addressing numbering, toll free numbers, or E911 services for VRS or IP Relay using whatever method they choose, electronic or otherwise.
- (6) *Affirmative Acknowledgements.* Affirmative acknowledgements from registered users of having received and understood the user notification can be obtained and stored electronically, e.g., through a VRS or IP Relay provider's website and in an electronic database.
- (7) *Ascertaining Registration Status of VRS or IP Relay User.* VRS and IP Relay providers must use electronic means to query the Numbering Directory using a VRS or IP Relay user's ten-digit number in order to determine whether a user is registered with another provider.<sup>41</sup>
- (8) *Verifying Registration and Eligibility Information.* VRS and IP Relay providers may use electronic means to verify the accuracy of registration information and to allow a consumer to certify that he or she has a medically recognized hearing or speech disability necessitating his or her use of TRS.
- (9) *Commission Approval for the Pass Through of Numbering Costs.* VRS and IP Relay providers may submit to the Commission in electronic format a request to pass through certain numbering-related costs to their users.
- (10) *Information Sharing After a Change in Default Providers.* A VRS provider that provisions equipment to a consumer can make available to a newly selected default provider, in an electronic format, certain information about that equipment.

#### **c. Four VRS Orders**

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*, the *2017 VRS Improvements Order*, the *2019 VRS Program Management Order*, and the *VRS At-Home Call Handling Order*.

- (1) *Reporting Fraudulent Activity.* VRS providers may use electronic means to report fraudulent activity to the Commission.
- (2) *Provider Certification – Annual Compliance Plan.* VRS providers' annual compliance plans may be submitted to the Commission electronically.
- (3) *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.

---

<sup>41</sup> Because there is only one IP Relay provider certified by the Commission, this requirement does not apply to IP Relay at this time.

**Structure and Practices of the Video Relay Service Program; Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities, CG Docket Nos. 10-51 & 03-123**

- (4) *Qualified DVC Entity – Application.* Entities that seek to become Qualified DVC Entities may submit both their applications and their notices of material changes to information on their applications by electronic means.
- (5) *Qualified DVC Entity – Response to Commission’s Notices.* Qualified DVC Entities’ responses to the Commission’s determination that the entity is no longer qualified, has materially misrepresented information, or has violated an applicable rule or other requirement may be submitted electronically.
- (6) *Qualified DVC Entity – TRS Numbering Directory.* The TRS Numbering Directory and TRS-URD are electronic databases. When a Qualified DVC Entity provisions and maintains routing information in the TRS Numbering Directory or creates an equivalent entry in the TRS-URD, the Qualified DVC Entity necessarily is using information technology.
- (7) *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.
- (8) *TRS User Registration.* An electronic means has been established for VRS providers to query the TRS-URD for user registration as well as registration of enterprise and public videophones. User as well as enterprise and public videophone removal from, and queries to, the TRS-URD also will be performed electronically.
- (9) *TRS-URD Per-Call Validation.* Per-call validation will be conducted electronically to expedite the call process.
- (10) *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.
- (11) *Retention of authorization of orders for change of default TRS providers.* These authorization may be maintained and preserved electronically by the new provider.
- (12) *Notice of the transfer or sale of iTRS users.* It is anticipated that advance notice will be sent out electronically by acquiring iTRS providers.
- (13) *Identify TRS minutes attributable to unauthorized change.* Provider communications with the TRS Fund administrator are anticipated to be performed through electronic means.
- (14) *Notice required for use of CPNI.* TRS providers are specifically permitted to provide required notification through electronic means, including email.
- (15) *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.
- (16) *Safeguards on the disclosure of CPNI.* The Commission anticipates that most of the required safeguards will be performed through electronic methods.
- (17) *Voluntary at-home VRS call handling.* The Commission anticipates that VRS providers that voluntarily participate in at-home call handling will collect, retain, and submit electronic records to comply with the requirements.

**d. *MLTS 911 and Dispatchable Location Order***

VRS, IP Relay, and covered IP CTS providers must provide automated dispatchable location, with each 911 call to the extent feasible. If a provider of non-fixed services finds it technically infeasible to provide automated dispatchable location, the provider must provide users' Registered Location or alternative location information through an electronic method. If such information is not available to a VRS or IP Relay provider via an electronic method, the provider must request the information from the user. The rules allow Internet-based TRS providers to route the call to an Emergency Calling Relay Center, so long as the provider has made a good-faith effort to obtain location data from all available alternative location sources.

4. None of the information collected as a result of the State and Federal Relay Program Certification orders, the three numbering orders, the four VRS orders, and the *MLTS 911 and Dispatchable Location Order* will be duplicative of other information.
5. The Commission has sought to minimize the burdens on small businesses, organizations and other small entities throughout the orders discussed herein.

**a. *State and Federal Relay Program Certification***

For state relay program certification, because no state is a small entity, there is no significant economic impact on small businesses or small entities.

For federal relay program certification, the Commission concluded that the public interest need to prevent fraud, waste, and abuse justifies the burden of imposing on iTRS providers, including small businesses, the certification and reporting requirements, which are minor as compared to the past substantial cost to the TRS Fund caused by waste, fraud, and abuse, much of which was brought under control through the use of certification and reporting requirements.

**b. *Three Numbering Orders***

In the *First Numbering Order*, *Second Numbering Order*, and the *iTRS Toll Free Order*, the Commission has attempted to balance the economic interests of small businesses with the significant public interest in access to numbering, toll free numbers, and E911 services when using VRS and IP Relay, and has taken several steps to minimize the information collection burden for small business concerns, including those with fewer than 25 employees.

- (1) *Routing Information.* In requiring that VRS and IP Relay providers obtain routing information for their registered users, the *First Numbering Order* requires that providers that have issued, leased, or otherwise provided customer premises equipment (usually larger providers) must ensure that such equipment delivers routing information to each user's default provider.
- (2) *Provision of Routing Information.* Once a provider has automatically received that information, it can provision the TRS Numbering Directory with that information electronically.
- (3) *Registered Location.* In requiring that VRS and IP Relay providers obtain their registered users' Registered Location, the *First Numbering Order* allows providers to comply with this requirement directly or by utilizing the services of a third party.
- (4) *Provision of Registered Location.* In requiring that VRS and IP Relay providers provision Registered Location information along with callback information to public safety officials

through ALI databases, the *First Numbering Order* allows providers to comply with this requirement directly or by utilizing the services of a third party.

- (5) *User Notification.* In requiring VRS and IP Relay providers to provide their users with an advisory about numbering, toll free numbers, and E911 services, the *First Numbering Order*, *Second Numbering Order*, and *iTRS Toll Free Order* only require posting on provider websites and in any promotional materials addressing those services.
- (6) *Affirmative Acknowledgements.* Affirmative acknowledgements from registered users of having received and understood the user notification can be obtained and stored electronically. The Commission believes that these requirements should entail minimal burden on small entities.
- (7) *Ascertaining Registration Status of VRS or IP Relay User.* To the extent that VRS and IP Relay providers will use electronic means to query the Numbering Directory using a VRS or IP Relay user's ten-digit number, the Commission believes that this requirement should entail minimal burden on small entities.<sup>42</sup>
- (8) *Verifying Registration and Eligibility Information.* The *Second Numbering Order* does not mandate the use of specific verification procedures and requires only that IP Relay providers implement a reasonable means of verifying registration and eligibility information that is not unduly burdensome to the consumer. Allowing IP Relay providers to establish their own verification procedures should minimize the burden on small entities. Responsibility for verification of registration and eligibility information of VRS users has been shifted to the TRS-URD administrator, thereby further reducing the burden for small business concerns.
- (9) *Commission Approval for the Pass Through of Numbering Costs.* The *Second Numbering Order* allows VRS and IP Relay providers to submit to the Commission in electronic format any request to pass through certain numbering-related costs to users, which should minimize any burden on small entities.
- (10) *Information Sharing After a Change in Default Providers.* A VRS provider that provisions equipment to a consumer can make available to a newly selected default provider, in an electronic format, the information about that equipment that is required by the *Second Numbering Order*. This requirement should reduce the burden on small entities that are selected to be the default provider of a consumer who previously received equipment from another provider.

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

#### c. Four VRS Orders

---

<sup>42</sup> Because there is only one IP Relay provider certified by the Commission, this requirement does not apply to IP Relay at this time.

**(1) 2013 VRS Reform Order**

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.

- (a) *Reporting Fraudulent Activity.* VRS providers' reports of fraudulent activity may be submitted to the Commission electronically.
- (b) *Provider Certification – Annual Compliance Plan.* VRS providers' annual compliance plans may be submitted to the Commission electronically.
- (c) *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.
- (d) *Internet-based TRS registration.* Any burdens associated with requirements relating to registering existing users were time-limited and have been completed, thereby reducing the record keeping burden on all providers, including small entities. The ongoing requirement of registering new users is necessary to protect the TRS Fund from waste, fraud, and abuse.
- (e) *TRS-URD verification of eligible VRS users.* The establishment of the TRS-URD has reduced the user verification requirements that VRS providers, including small entities, were otherwise required to bear, thereby simplifying the process by which VRS providers, including small entities, are required to ensure the eligibility of VRS users.
- (f) *Verification of orders for change of default TRS provider.* Letters of Authorization 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.
- (g) *Procedures for resolution of unauthorized changes in default provider.* These procedures are anticipated to be performed and preserved electronically by the new provider.
- (h) *Notice of the transfer or sale of iTRS users.* It is anticipated that advance notice will be sent out electronically by acquiring iTRS providers.
- (i) *Identify TRS minutes attributable to unauthorized change.* Provider communications with the TRS Fund administrator are anticipated to be performed through electronic means.
- (j) *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.
- (k) *Safeguards required for use of CPNI.* Records of use of customers' CPNI may be preserved electronically, and iTRS provider reporting is included in their annual reports. As a consequence, no additional reporting documents will be required for these providers.

**Structure and Practices of the Video Relay Service Program; Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities, CG Docket Nos. 10-51 & 03-123**

(1) *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.

**(2) 2017 VRS Improvements Order**

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.

**(3) 2019 VRS Program Management Order**

In the *2019 VRS Program Management Order*, the Commission adopted rules applicable to Qualified Direct Video Entities and enterprise and public videophones. These requirements are no more burdensome than those currently applicable to VRS providers and are needed to ensure compliance with the Commission's rules and protect the TRS Fund against waste, fraud, and abuse. To minimize the information collection burden for small business concerns, including those with fewer than 25 employees, the Commission:

- (a) Limited the certification application for Qualified DVC Entities to the information needed to ensure that such entities would follow proper procedures, comply with all Commission rules when accessing the TRS Numbering Database, and protect the TRS Fund against waste, fraud, and abuse. Further, entities that want to become Qualified DVC Entities would do so voluntarily and can make their own decisions about whether the benefits of participation exceed the cost of complying with the corresponding regulations.
- (b) Limited the information for each number that each Qualified DVC Entity must submit to the TRS Numbering Directory to the information necessary to ensure proper routing of telephone calls and protect the TRS Fund from waste, fraud, and abuse.
- (c) Limited the registration and certification information for enterprise and public videophones to that which is necessary to register such devices to the TRS-URD and provision the TRS Numbering Directory for the routing of calls, and in the case of enterprise videophones, ensure that the person responsible for the videophone makes reasonable efforts to ensure that only eligible VRS users make use of the enterprise phone.

The Commission did not otherwise alter the information collection burden for small business concerns.

**(4) VRS At-Home Call Handling Order**

VRS providers, including small entities, are given the option of participating in voluntary VRS at-home call handling and may determine on their own accord whether the benefits of participation exceed the cost of complying with the requirements associated with at-home call handling.

**d. MLTS 911 and Dispatchable Location Order**

In the *MLTS 911 and Dispatchable Location Order*, the Commission adopted flexible rules and a longer implementation time frame for VRS, IP Relay, and covered IP CTS providers for providing accurate 911 location information. The extended time and implementation flexibility, allowing VRS, IP Relay, and covered IP CTS providers to fall back to existing 911 location information requirements during the implementation period, minimize the impact of the new requirements on all such providers, including small entities.

6. The consequences to the TRS program if the collections were not conducted or were conducted less frequently are discussed below.

**a. State and Federal Relay Program Certification**

If the collections were not conducted, or conducted less frequently, the Commission and Fund administrator would have less of a basis to ensure compliance with the Commission's rules and to detect and prevent waste, fraud, and abuse in the provision of TRS, and the public would have less of a basis to rely on the quality of relay services.

**b. Three Numbering Orders**

**(1) First Numbering Order**

- (a) If a VRS or IP Relay provider did not collect a registered user's routing information whenever that information changed or did not provision any updated routing information to the TRS Numbering Directory, individuals and businesses trying to contact that registered user using his or her telephone number would be unable to complete the call. Further, if the contacting entity were a public safety official trying to reestablish contact after an interrupted call, inadequate or outdated routing information could make reestablishing the call difficult or even impossible.
- (b) If a VRS or IP Relay provider did not collect a registered user's Registered Location whenever that user sought to change it or did not provision a registered user's Registered Location and other callback information through the ALI databases as needed, emergency calls could be routed to geographically inappropriate emergency authorities, and public safety officials would lose some of the benefits of E911 service.
- (c) Posting a consumer advisory on a VRS or IP Relay provider's website is a one-time collection and is needed to inform users who may not realize the capabilities and limitations of those providers absent such an advisory. Requiring the inclusion of an advisory whenever a VRS or IP Relay provider disseminates promotional materials regarding numbering or E911 services helps ensure that every user who may rely on those services will know the provider's capabilities and limitations.
- (d) The affirmative acknowledgements by registered users of having received the consumer advisory is a one-time collection. Without it, the Commission's ability to review and enforce its advisory requirements would be hampered.

**(2) Second Numbering Order**

- (a) The requirement that VRS and IP Relay providers ascertain the registration status of VRS and IP Relay users is needed to prevent service (except for emergency calls) to unregistered users. Although an unregistered user may make an emergency VRS or IP

Relay call, routing such call to the geographically appropriate emergency authorities and ascertaining the location of the emergency may prove challenging.

- (b) Requiring IP Relay providers to verify registration and eligibility information helps to reduce the fraudulent use of these services. Now that the TRS-URD database has been implemented, and the responsibility for verification of the registration information of VRS users has shifted to the TRS-URD administrator, the VRS provider remains responsible for collecting the registration information and user certification of eligibility and passing the information on to the TRS-URD. Absent these requirements, the use of VRS and IP Relay by individuals or entities not authorized to use these services would likely increase.
- (c) VRS and IP Relay providers must obtain Commission approval to pass through certain numbering-related costs to their users. Absent this requirement, users might be charged costs exceeding those that the Commission has determined to be reasonable.
- (d) When a VRS consumer switches default providers, the VRS provider that issued the equipment to the consumer must make available to the consumer's newly selected default provider certain information about the equipment. Absent this requirement, provider-supplied equipment may not operate properly, or at all, following the change of default providers.

**(3) *iTRS Toll Free Order***

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

**c. Four VRS Orders**

**(1) *2013 VRS Reform Order***

- (a) 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.
- (b) 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.
- (c) The requirement that VRS providers must submit information to the TRS-URD greatly enhances the ability of the Commission to ensure that service is available to eligible users only and protects 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.
- (d) Requirements preventing an unauthorized change of a user's default provider helps ensure that consumer protection policies are enhanced for TRS users and prevents users from being subjected to these unauthorized and unwanted changes. Moreover, these

requirements conform the protections afforded to TRS users with those provided to other telephone users in furtherance of Federal policy.

- (e) 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.
- (f) 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.
- (g) 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.
- (h) 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.

**(2) 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.

**(3) 2019 VRS Program Management Order**

- (a) We require registration of enterprise and public videophones. This measure helps guard against fraudulent use of the videophones.
- (b) We permit the use of the TRS Numbering Directory instead of the TRS-URD for VRS per-call validation, to ensure that callers are registered users and to guard against fraudulent use of VRS.
- (c) We allow Qualified DVC Entity customer support service providers to access the TRS Numbering Directory to enable DVC. This information collection ensures that consumer point-to-point video calls to Qualified DVC Entity customer support centers are properly routed.

**(4) VRS At-Home Call Handling Order**

The requirements in the *VRS At-Home Call Handling Order* regarding certification applications, inspections of workstations, assigning workstation identification numbers, recordkeeping, and reporting are needed to protect against waste, fraud, and abuse and ensure the quality and privacy of the consumer VRS experience. These requirements are necessary due to the past history of waste, fraud, and abuse when the Commission permitted VRS at-home call handling prior to 2011.

**d. *MLTS 911 and Dispatchable Location Order***

The collection and transmission of dispatchable location or other location information for every 911 call will ensure that emergency call handlers and emergency responders or law enforcement personnel have sufficient information to locate the caller in a timely manner in an emergency situation, allowing such entities to provide help to the individual placing the 911 call.

Dispatchable location can be more precise than Registered Location, which is currently used for 911 VRS and IP Relay calls. The failure to provide applicable location information will hamper emergency responders' ability to locate an individual in an emergency situation.

7. The following special circumstances may result in an information collection that is inconsistent with OMB's guidelines in 5 CFR § 1320.5(d)(2).

**a. *State and Federal Relay Program Certification***

- (1) Although notifications of substantive change occur on occasion, it is possible that an iTRS provider may have substantive changes more often than quarterly. However, the Commission and the TRS Fund administrator need to know of such substantive changes to better administer the TRS program.
- (2) Based on past experience, iTRS providers often file notifications of unforeseen service interruptions with the Commission and post the information on their websites more often than quarterly. However, the Commission, the TRS Fund administrator, and consumers need to know of service interruptions because consumers are not receiving service during such service interruptions, and the Commission needs the information so that it can determine whether to take any action to remedy service interruptions.

**b. *Three Numbering Orders***

VRS and IP Relay providers are required to retain user registration information and documentation for as long as the consumer continues to receive service. For many consumers, this may be more than three years. However, retention of such information is necessary for both the provider who is providing service to the consumer and the TRS Fund administrator who is responsible for ensuring that only eligible users are registered for and receiving service.

**c. *Four VRS Orders – VRS At-Home Call Handling Order***

- (1) Pursuant to 47 CFR § 64.604(b)(8)(vi)(D), each VRS provider that voluntarily participates in VRS at-home call handling 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. The five-year requirement also aligns with other data retention obligations of TRS providers.

(2) Pursuant to 47 CFR § 64.604(b)(8)(viii), each VRS provider that voluntarily participates in VRS at-home call handling must include in its monthly report to the TRS Fund administrator the home workstation ID, street address, and CA ID number for the CA handling the call, as well as the call center ID, street address, and name of the supervisor of the call center responsible for oversight of the workstation. 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.

**d. *MLTS 911 and Dispatchable Location Order***

The information collections in the *MLTS 911 and Dispatchable Location Order* are not being conducted in any manner inconsistent with the requirements of 5 CFR § 1320.5(d)(2).

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 May 8, 2020, at 85 FR 26976, 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, other than the cost recovery regime established pursuant to section 225 of the Communications Act of 1934, as amended, whereby the TRS Fund compensates TRS providers for the reasonable costs of providing service in compliance with TRS regulations.
10. The Commission has taken several steps to specifically protect registered users' routing information and the provision of that information to the TRS Numbering Directory. First, VRS and IP Relay providers "must ensure that all [equipment] they have issued . . . to VRS or IP Relay users delivers routing information or other information *only* to the user's default provider, except as is necessary to complete or receive 'dial around' calls on a case-by-case basis."<sup>43</sup> Second, VRS and IP Relay providers must "[t]ake such steps as are necessary to cease acquiring routing information from any VRS or IP Relay user that ports his or her number to another VRS or IP Relay provider or otherwise selects a new default provider,"<sup>44</sup> and they must stop provisioning that information to the TRS Numbering Directory.<sup>45</sup> Third, access to the routing information in the TRS Numbering Directory is limited to VRS and IP Relay providers, Qualified Direct Video Entities, and the TRS Numbering administrator.<sup>46</sup> The TRS Numbering administrator is required to keep all such information confidential. The TRS Fund administrator is required to keep all data obtained from TRS providers

---

<sup>43</sup> 47 CFR § 64.611(f)(1) (emphasis added).

<sup>44</sup> 47 CFR § 64.611(c)(2)(i).

<sup>45</sup> 47 CFR § 64.611(c)(2)(ii)(A).

<sup>46</sup> 47 CFR § 64.613(a)(4).

**Structure and Practices of the Video Relay Service Program; Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities, CG Docket Nos. 10-51 & 03-123**

confidential and may not disclose such information in company-specific form unless directed to do so by the Commission.

The Commission also requires VRS and IP Relay providers to ensure that obtaining a registered user's Registered Location and provisioning that information along with callback information into or through ALI databases "is limited to that needed to facilitate 911 services, is made available only to emergency call handlers and emergency response or law enforcement personnel, and is used for the sole purpose of ascertaining a user's location in an emergency situation or for other emergency or law enforcement purposes."<sup>47</sup>

The *Second Numbering Order* also prohibits the unauthorized disclosure of a VRS or IP Relay user's personal information.<sup>48</sup>

In addition, in the *2013 VRS Reform Order*, the Commission adopted customer proprietary network information (CPNI) rules for TRS to ensure that the TRS user experiences a service that is functionally equivalent to a voice telephone service, including the privacy protections of the Commission's CPNI regulations.<sup>49</sup>

This information collection requires the collection of personally identifiable information (PII) on individuals; however, a third party, the individual's VRS or IP Relay provider, collects the PII and in the case of VRS, the provider passes on the PII to the TRS-URD administrator, who is responsible for verification of the registration and eligibility information.<sup>50</sup> The Commission has no direct involvement in this collection. However, VRS and IP Relay providers generally have written privacy policies governing the treatment of information collected from their users, and the Commission expects that much of the information collected here would fall under those policies.

Further, the Commission takes several steps to specifically protect CPNI. As noted in response to Question 1, the FCC completed the requirements for a 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. *Information Collection Requirements:***

Below, we present (a) the collections for OMB Control Number 3060-1201, with updates; (b) consolidated with (i) the collections contained in OMB Control Number 3060-1089 related to the telephone numbering system and E911 requirements for Internet-based TRS providers, and (ii) the collections contained in OMB Control Number 3060-1150 for the registration and certification of

---

<sup>47</sup> 47 CFR § 64.605(a)(2)(vi)). 47 CFR § 64.605(a)(2)(vi) has been renumbered as 47 CFR § 9.14(b)(2)(vi).

<sup>48</sup> See *Second Numbering Order*, 24 FCC Rcd at 824, para. 71.

<sup>49</sup> See *2013 VRS Reform Order*, 28 FCC Rcd at 8680-87, paras. 155-72; see also 47 CFR §§ 64.5101-.5111 (TRS CPNI rules).

<sup>50</sup> *2013 VRS Reform Order*, 28 FCC Rcd at 8647-56, paras. 62-86.

TRS providers, with updates; and (c) the collections for the *2019 VRS Program Management Order* and the *VRS At-Home Call Handling Order*.

**(A) Reporting Unauthorized and Unnecessary Use of VRS.****(1) VRS Providers**

Each respondent will 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.

**ANNUAL NUMBER OF RESPONDENTS: 5**

5 VRS providers

**ANNUAL NUMBER OF RESPONSES: 100**

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).  
5 respondents x 5 responses / quarter x 4 quarters = 100

**ANNUAL BURDEN HOURS: 50 hours**

The Commission estimates that each respondent will require approximately 0.5 hour (30 minutes) to produce each report.

100 responses x 0.5 hour / response = 50 hours

**ANNUAL IN-HOUSE COST: \$3,294**

The Commission assumes that respondents will use in-house personnel whose pay is comparable to senior-level federal employees (GS-14/5 at \$65.88 per hour) to report fraudulent activities.

50 hours x \$65.88 / hour = \$3,294

**(2) Unusual Activity for Enterprise and Public Videophones**

Each respondent VRS provider must monitor enterprise and public videophone usage, and report any unusual activity to the TRS Fund administrator.

**ANNUAL NUMBER OF RESPONDENTS: 5**

5 VRS providers

**ANNUAL NUMBER OF RESPONSES: 25**

The Commission assumes that each VRS provider will detect five unusual activities each year.

5 responses/respondent x 5 respondents = 25 responses

**ANNUAL BURDEN HOURS: 13**

The Commission estimates that each respondent will require approximately 0.5 hour (30 minutes) to produce each report.

25 responses x 0.5 hour/response = 12.5 hours (rounded to 13)

**ANNUAL IN-HOUSE COST: \$823.50**

The Commission assumes that respondents will use in-house personnel whose pay is comparable to senior-level federal employees (GS-14/5 at \$65.88 per hour) to report fraudulent activities

12.5 hours x \$65.88 / hour = \$823.50

**(3) Removals and Disconnections for Enterprise and Public Videophones**

Each respondent VRS providers must notify the TRS Fund administrator within one business day in the event that a registered enterprise or public videophone is removed or permanently disconnected from VRS.

**ANNUAL NUMBER OF RESPONDENTS: 5**

5 VRS providers

**ANNUAL NUMBER OF RESPONSES: 250**

The Commission assumes that each VRS provider will report 50 removals or disconnections of enterprise and public videophones each year.

50 responses/respondent x 5 respondents = 250 responses

**ANNUAL BURDEN HOURS: 125**

The Commission estimates that each respondent will require approximately 0.5 hour (30 minutes) to produce each report.

250 responses x 0.5 hour/response = 125 hours

**ANNUAL IN-HOUSE COST: \$8,235**

The Commission assumes that respondents will use in-house personnel whose pay is comparable to senior-level federal employees (GS-14/5 at \$65.88 per hour) to draft and submit these reports.

125 hours x \$65.88 / hour = \$8,235

**CUMULATIVE TOTALS (for A):**

**ANNUAL NUMBER OF RESPONDENTS: 5<sup>51</sup>**

**ANNUAL NUMBER OF RESPONSES: 100 + 25 + 250 = 375**

**ANNUAL BURDEN HOURS: 50 + 13 + 125 = 188**

**ANNUAL IN-HOUSE COSTS: \$3,294 + \$825.50 + \$8,235 = \$12,354.50**

**(B) VRS Provider Certification – Annual Compliance Plan.**

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

---

<sup>51</sup> Each subsection above refers to the same 5 VRS providers.

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**

5 VRS providers<sup>52</sup>

**ANNUAL NUMBER OF RESPONSES: 5**

5 respondents x 1 response / respondent = 5

**ANNUAL BURDEN HOURS: 400 hours**

The Commission estimates that each respondent will require 80 hours to prepare and submit the annual report.

5 responses x 80 hours / response = 400 hours

**ANNUAL IN-HOUSE COST: \$26,352**

The Commission assumes that respondents will use in-house personnel whose pay is comparable to senior-level federal employees (GS-14/5 at \$65.88 per hour) to prepare and submit an annual compliance plan report.

400 hours x \$65.88 / hour = \$26,352

**(C) VRS Provider Certification – Response to Inadequate Annual Compliance Plan.****ANNUAL NUMBER OF RESPONDENTS: 1**

The Commission estimates that 1 VRS provider<sup>53</sup> will need to prepare and submit an amended compliance plan correcting the identified defects upon the Commission's request on an annual basis.

**ANNUAL NUMBER OF RESPONSES: 1**

1 response / respondent x 1 respondent = 1 response

**ANNUAL BURDEN HOURS: 5 hours**

The Commission estimates that respondents will require about 5 hours to prepare and submit an amended compliance plan.

5 hours / response x 1 response = 5 hours

**ANNUAL IN-HOUSE COST: \$329.40**

The Commission assumes that respondents will use in-house personnel whose pay is comparable to senior-level federal employees (GS-14/5 at \$65.88 per hour) to prepare and submit an amended compliance plan report.

5 hours x \$65.88/hour = \$329.40

**(D) TRS User Certification of Eligibility.****(1) VRS Providers Certifying New VRS Users**

Each respondent will 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)

---

<sup>52</sup> These are the same 5 VRS providers identified in subsection (A).

<sup>53</sup> This VRS provider is one of the 5 VRS providers identified in subsection (A).

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**

5 VRS providers<sup>54</sup>

**ANNUAL NUMBER OF RESPONSES: 10,000**

10,000 new users (collectively for all 5 providers) x 1 response / new user = 10,000

**ANNUAL BURDEN HOURS: 2,500**

The Commission estimates that each respondent will require approximately 0.25 hour (15 minutes) to certify the eligibility of each newly registered VRS user.

10,000 responses x 0.25 hour / response = 2,500 hours

**ANNUAL IN-HOUSE COST: \$164,700**

The Commission assumes that respondents will use in-house personnel whose pay is comparable to senior-level federal employees (GS-14/5 at \$65.88 per hour) to certify the eligibility of newly enrolled VRS users.

2,500 hours x \$65.88 / hour = \$164,700

**(2) New VRS Users Submitting Their Certifications**

New VRS user respondents will review, execute, and submit to their VRS providers 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: 10,000**

The Commission estimates there will be 10,000 new VRS user respondents.

**ANNUAL NUMBER OF RESPONSES: 10,000**

10,000 new users x 1 response / user = 10,000

**ANNUAL BURDEN HOURS: 5,000**

The Commission estimates that each user will require 0.5 hour (30 minutes) to review, execute and submit the certification.

10,000 responses x 0.5 hour / response = 5,000 hours

**ANNUAL IN-HOUSE COST: \$0**

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

**(3) Providers Certifying New Hearing Point-to-point Video Users**

Each VRS provider will certify the eligibility of each enrolled hearing point-to-point video user. Such certifying process requires the respondent to first obtain written certification from the user containing specific attestations on a separate form, and the respondent 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

---

<sup>54</sup> These are the same 5 VRS providers identified in subsection (A).

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**

5 VRS providers<sup>55</sup>

**ANNUAL NUMBER OF RESPONSES: 1,000**

The Commission estimates that the 5 VRS providers collectively will enroll 1,000 new point-to-point video users.

1,000 users x 1 response / user = 1,000

**ANNUAL BURDEN HOURS: 250 hours**

The Commission estimates that the respondents will require 0.25 hour (15 minutes) per response.

1,000 responses x 0.25 hour / response = 250 hours

**ANNUAL IN-HOUSE COST: \$16,470**

The Commission assumes that respondents will use in-house personnel whose pay is comparable to senior-level federal employees (GS-14/5 at \$65.88 per hour) to certify the eligibility of newly enrolled VRS users.

250 hours x \$65.88 / hour = \$16,470

**(4) Hearing Point-to-Point Video Users Submitting Certifications**

The new hearing point-to-point video user respondents will 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: 1,000**

The Commission estimates that there will be 1,000 new hearing point-to-point video users.

**ANNUAL NUMBER OF RESPONSES: 1,000**

1,000 respondents x 1 response / respondent = 1,000

**ANNUAL BURDEN HOURS: 500 hours**

The Commission estimates that the users each will require approximately 0.5 hour (30 minutes) to review, execute, and submit their certifications.

1,000 responses x 0.5 hour / response = 500

**ANNUAL IN-HOUSE COST: \$0**

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

**CUMULATIVE TOTALS (for D):**

**ANNUAL NUMBER OF RESPONDENTS: 11,005**

$5^{56} + 10,000 + 1,000 = 11,005$

<sup>55</sup> These are the same 5 VRS providers identified in subsection (A).

<sup>56</sup> Each of the subsections that refer to VRS providers are referring to the same 5 VRS providers identified in subsection (A).

**ANNUAL NUMBER OF RESPONSES:** 22,000

$$10,000 + 10,000 + 1,000 + 1,000 = 22,000$$

**ANNUAL BURDEN HOURS:** 8,250

$$2,500 + 5,000 + 250 + 500 = 8,250$$

**ANNUAL IN-HOUSE COSTS:** \$181,170

$$\$164,700 + \$0 + \$16,470 + \$0 = \$181,170$$

**(E) TRS User Registration.**

**(1) VRS Providers Obtaining Information from New VRS Users**

Each respondent will 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

5 VRS providers<sup>57</sup>

**ANNUAL NUMBER OF RESPONSES:** 10,000

The Commission estimates that for all 5 VRS providers, collectively there will be 10,000 new users each year.

$$10,000 \text{ new users} \times 1 \text{ response / new user} = 10,000$$

**ANNUAL BURDEN HOURS:** 5,000 hours

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.

$$10,000 \text{ responses} \times 0.5 \text{ hour / response} = 5,000 \text{ hours}$$

**ANNUAL IN-HOUSE COST:** \$329,400

The Commission assumes that respondents will use in-house personnel whose pay is comparable to senior-level federal employees (GS-14/5 at \$65.88 per hour) to collect and submit the required information for each newly enrolled user to the TRS-URD.

$$5,000 \text{ hours} \times \$65.88 / \text{hour} = \$329,400$$

**(2) New VRS Users Providing Information**

The new VRS user respondents will 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 by each new user.

**ANNUAL NUMBER OF RESPONDENTS:** 10,000

The Commission estimates that there will be 10,000 new VRS users.<sup>58</sup>

<sup>57</sup> These are the same 5 VRS providers identified in subsection (A).

<sup>58</sup> These are the same 10,000 VRS user respondents that are identified in subsection (D)(2).

**Structure and Practices of the Video Relay Service Program; Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities, CG Docket Nos. 10-51 & 03-123****ANNUAL NUMBER OF RESPONSES: 10,000**

10,000 new VRS users x 1 response / user = 10,000

**ANNUAL BURDEN HOURS: 5,000 hours**

The Commission estimates that each new VRS user will require approximately 0.5 hour (30 minutes) to submit the information to the provider.

10,000 responses x 0.5 hour / response = 5,000 hours

**ANNUAL IN-HOUSE COST: \$0**

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

**(3) VRS Providers Submitting Information for New Hearing Point-to-Point Video Users**

Each respondent will collect and submit specific information for each newly enrolled hearing point-to-point video user to the TRS-URD User Registration Database, 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 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**

5 VRS providers<sup>59</sup>

**ANNUAL NUMBER OF RESPONSES: 1,000**

The Commission estimates that there will be 1,000 new hearing point-to-point video users. 1,000 new users x 1 response / user = 1,000 responses

**ANNUAL BURDEN HOURS: 500 hours**

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 video user to the TRS-URD.

1,000 responses x 0.5 hour / response = 500 hours

**ANNUAL IN-HOUSE COST: \$32,940**

The Commission assumes that respondents will use in-house personnel whose pay is comparable to senior-level federal employees (GS-14/5 at \$65.88 per hour) to collect and submit the required information for each newly enrolled user to the TRS-URD.

500 hours x \$65.88/ hour = \$32,940

**(4) New Hearing Point-to-Point Video Users Submitting Information**

The Commission estimates that 1,000 new hearing point-to-point video user respondents 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: 1,000**

---

<sup>59</sup> These are the same 5 VRS providers identified in subsection (A).

**Structure and Practices of the Video Relay Service Program; Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities, CG Docket Nos. 10-51 & 03-123**

The Commission estimates that there will be 1,000 new hearing point-to-point video users.<sup>60</sup>

**ANNUAL NUMBER OF RESPONSES: 1,000**

1,000 respondents x 1 response / respondent = 1,000 responses

**ANNUAL BURDEN HOURS: 500 hours**

The Commission estimates that each user will require approximately 0.5 hour (30 minutes) to submit the information to the VRS provider.

1,000 responses x 0.5 hour / response = 500 hours

**ANNUAL IN-HOUSE COST: \$0**

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

**(5) VRS Providers Retaining Records of Registration Information, Certification, and Consent for New VRS Users**

Each respondent will retain a record of registration information, certification, and consent from each new VRS user to transmit each new VRS user's information to the TRS-URD.

**ANNUAL NUMBER OF RESPONDENTS: 5**

5 VRS providers<sup>61</sup>

**ANNUAL NUMBER OF RESPONSES: 10,000**

The Commission estimates that there will be 10,000 new users.

10,000 new users x 1 response new user = 10,000 responses

**ANNUAL BURDEN HOURS: 500 hours**

The Commission estimates that each respondent will require .05 hour (3 minutes) to retain each record of registration information, certification, and consent.

10,000 responses x .05 hour / response = 500 hours

**ANNUAL IN-HOUSE COST: \$32,940**

The Commission assumes that respondents will use in-house personnel whose pay is comparable to senior-level federal employees (GS-14/5 at \$65.88 per hour) to retain a record of registration information, certification, and consent from each user to transmit the user's information to the TRS-URD.

500 hours x \$65.88 / hour = \$32,940

**(6) VRS Providers Retaining Records of Registration Information, Certification, and Consent for New Hearing Point-to-Point Video Users**

The Commission estimates that each respondent will require approximately .05 hour (3 minutes) to retain a record of registration information, certification, and consent from each hearing point-to-point video user to transmit each such user's information to the TRS-URD.

**ANNUAL NUMBER OF RESPONDENTS: 5**

5 VRS providers<sup>62</sup>

**ANNUAL NUMBER OF RESPONSES: 1,000**

<sup>60</sup> These are the same 1,000 hearing point-to-point video user respondents that are identified in subsection (D)(4).

<sup>61</sup> These are the same 5 VRS providers identified in subsection (A).

<sup>62</sup> These are the same 5 VRS providers identified in subsection (A).

**Structure and Practices of the Video Relay Service Program; Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities, CG Docket Nos. 10-51 & 03-123**

The Commission estimates that, for the 5 VRS providers, collectively there will be 5,000 new hearing point-to-point video users.

$$5,000 \text{ new users} \times 1 \text{ response / new user} = 5,000 \text{ responses}$$

**ANNUAL BURDEN HOURS: 50 hours**

The Commission estimates that each respondent will require approximately .05 hour (3 minutes) to retain each record of registration information, certification, and consent.

$$1,000 \text{ responses} \times 0.05 \text{ hour / response} = 50 \text{ hours}$$

**ANNUAL IN-HOUSE COST: \$3,294**

The Commission assumes that respondents will use in-house personnel whose pay is comparable to senior-level federal employees (GS-14/5 at \$65.88 per hour) to retain each record of registration information, certification, and consent for each newly enrolled hearing point-to-point video user.

$$50 \text{ hours} \times \$65.88 / \text{hour} = \$3,294$$

**(7) Registration and Transmission to TRS-URD for Existing Enterprise and Public Videophones**

A VRS provider for an existing enterprise or public videophone will transmit to the TRS-URD information such as the NANP number for the videophone, location, date of initiation of service, name of an individual responsible for maintaining the videophone, the certification of the responsible individual as to the individual's knowledge about the videophone, the costs, and for enterprise phones, taking reasonable efforts to ensure only eligible VRS users use the enterprise videophone, and consent of the responsible individual for the provider to transmit the information to the TRS-URD administrator.

The Commission estimates that there are 5 VRS provider respondents.

**ANNUALIZED NUMBER OF RESPONDENTS: 2**

$$5 \text{ VRS providers}^{63} / 3 = 1.67 \text{ (rounded to 2)}$$

**ANNUALIZED NUMBER OF RESPONSES: 18,000**

The Commission estimates that there are approximately 54,000 existing enterprise and public videophones, and thus 10,800 responses on average for each of the respondents. This is a one-time burden.

$$5 \text{ respondents} \times 10,800 \text{ responses} = 54,000 \text{ responses (one-time burden)} / 3 = 18,000 \text{ responses annualized}$$

**ANNUALIZED BURDEN HOURS: 18,000 hours**

The Commission estimates that each respondent will spend 1 hour obtaining and transmitting the information to the TRS-URD for each videophone.<sup>64</sup>

$$54,000 \text{ responses} \times 1 \text{ hour / response} = 54,000 \text{ hours (one-time burden)} / 3 = 18,000 \text{ hours annualized}$$

**ANNUALIZED IN-HOUSE COST: \$1,185,840**

The Commission assumes that respondents will use in-house personnel whose pay is comparable to senior-level federal employees (GS-14/5 at \$65.88 per hour) to collect and submit the required information for each videophone.

<sup>63</sup> These are the same 5 VRS providers identified in subsection (A). Annualizing creates a subset of the 5 providers.

<sup>64</sup> The estimate of 1 hour includes obtaining the certification of the responsible individual in addition to the registration information and consent.

**Structure and Practices of the Video Relay Service Program; Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities, CG Docket Nos. 10-51 & 03-123**

18,000 hours annualized x \$65.88 / hour = \$1,185,840

**(8) Registration and Certification of the Responsible Individual for Existing Enterprise and Public Videophones**

An responsible individual for an existing enterprise or public videophone will register with a VRS provider by giving to the provider information such as the NANP number for the videophone, location, date of initiation of service, name of an individual responsible for maintaining the videophone, the certification of the responsible individual as to the individual's knowledge about the videophone, the costs, and for enterprise phones, taking reasonable efforts to ensure only eligible VRS users use the enterprise videophone, and consent of the responsible individual for the provider to transmit the information to the TRS-URD administrator.

The Commission estimates that there will be 54,000 responsible individual respondents, one for each of 54,000 existing videophones.

**ANNUALIZED NUMBER OF RESPONDENTS: 18,000**

54,000 individuals responsible for enterprise and public videophones (all in one year) / 3 = 18,000 respondents annualized

**ANNUALIZED NUMBER OF RESPONSES: 18,000**

54,000 respondents x 1 response / respondent = 54,000 responses (one-time) / 3 = 18,000 responses annualized

**ANNUALIZED BURDEN HOURS: 18,000 hours**

The Commission estimates that each respondent will spend 1 hour giving the registration information, certification, and consent to the provider for each videophone.<sup>65</sup>

54,000 responses x 1 hour / response = 54,000 hours (one-time) / 3 = 18,000 hours annualized

**ANNUALIZED IN-HOUSE COST: \$1,185,840**

The Commission assumes that the responsible individual respondents are in-house personnel whose pay is comparable to senior-level federal employees (GS-14/5 at \$65.88 per hour) to collect and submit the required information for each videophone.

18,000 hours annualized x \$65.88 / hour = \$1,185,840

**(9) Registration and Transmission to TRS-URD for New Enterprise and Public Videophones**

A VRS provider for a new enterprise or public videophone will transmit to the TRS-URD information such as the NANP number for the videophone, location, date of initiation of service, name of an individual responsible for maintaining the videophone and the certification of the responsible individual as to the individual's knowledge about the videophone, the costs, and for enterprise phones, taking reasonable efforts to ensure only eligible VRS users use the enterprise videophone, and consent of the responsible individual for the provider to transmit the information to the TRS-URD administrator.

The Commission estimates that there are 5 VRS provider respondents.

**ANNUAL NUMBER OF RESPONDENTS: 5**

---

<sup>65</sup> The estimate of 1 hour includes obtaining the certification of the responsible individual in addition to the registration information and consent.

5 VRS providers<sup>66</sup>

**ANNUAL NUMBER OF RESPONSES: 5,000**

The Commission estimates that there will be approximately 5,000 new enterprise and public videophones annually, and thus 1,000 responses annually on average for each of the 5 respondents.

5 respondents x 1,000 responses = 5,000 responses annually

**ANNUAL BURDEN HOURS: 5,000 hours**

The Commission estimates that each respondent will spend 1 hour obtaining and transmitting the information to the TRS-URD for each videophone.<sup>67</sup>

5,000 responses x 1 hour / response = 5,000 hours annually

**ANNUAL IN-HOUSE COST: \$329,400**

The Commission assumes that respondents will use in-house personnel whose pay is comparable to senior-level federal employees (GS-14/5 at \$65.88 per hour) to collect and submit the required information for each videophone.

5,000 hours x \$65.88 / hour = \$329,400

**(10) Registration and Certification of the Responsible Individual for New Enterprise and Public Videophones**

A responsible individual for a new enterprise or public videophone will register with a VRS provider by giving to the provider information such as the NANP number for the videophone, location, date of initiation of service, name of an individual responsible for maintaining the videophone, the certification of the responsible individual as to the individual's knowledge about the videophone, the costs, and for enterprise phones, taking reasonable efforts to ensure only eligible VRS users use the enterprise videophone, and consent of the responsible individual for the provider to transmit the information to the TRS-URD administrator.

The Commission estimates that there will be 5,000 responsible individual respondents, one for each of 5,000 new videophones.

**ANNUAL NUMBER OF RESPONDENTS: 5,000**

5,000 individuals responsible for enterprise and public videophones = 5,000 respondents annually

**ANNUAL NUMBER OF RESPONSES: 5,000**

5,000 respondents x 1 response / respondent = 5,000 responses annually

**ANNUAL BURDEN HOURS: 5,000 hours**

The Commission estimates that each respondent will spend 1 hour giving the registration information, certification, and consent to the provider for each videophone.<sup>68</sup>

5,000 responses x 1 hour / response = 5,000 hours annually

**ANNUAL IN-HOUSE COST: \$329,400**

---

<sup>66</sup> These are the same 5 VRS providers identified in subsection (A).

<sup>67</sup> The estimate of 1 hour includes obtaining the certification of the responsible individual in addition to the registration information and consent.

<sup>68</sup> The estimate of 1 hour includes obtaining the certification of the responsible individual in addition to the registration information and consent.

**Structure and Practices of the Video Relay Service Program; Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities, CG Docket Nos. 10-51 & 03-123**

The Commission assumes that respondents will use in-house personnel whose pay is comparable to senior-level federal employees (GS-14/5 at \$65.88 per hour) to collect and submit the required information for each videophone.

$5,000 \text{ hours} \times \$65.88 / \text{hour} = \$329,400$

**(11) VRS Providers Retaining Records of Registration Information, Certification, and Consent for Existing Enterprise and Public Videophones**

Each respondent will retain a record of registration information, certification, and consent from the responsible individual for each existing enterprise and public videophone.

**ANNUALIZED NUMBER OF RESPONDENTS: 2**

$5 \text{ VRS providers}^{69} / 3 = 1.67 \text{ (rounded to 2)}$

**ANNUALIZED NUMBER OF RESPONSES: 18,000**

The Commission estimates that there are approximately 54,000 existing enterprise and public videophones, and thus 10,800 responses on average for each of the respondents. This is a one-time burden.

$5 \text{ respondents} \times 10,800 \text{ responses} = 54,000 \text{ responses (one-time burden)} / 3 = 18,000 \text{ responses annualized}$

**ANNUALIZED BURDEN HOURS: 900 hours**

The Commission estimates that each respondent will require .05 hour (3 minutes) to retain each record of registration information, certification, and consent.

$54,000 \text{ responses} \times 0.05 \text{ hour / response} = 2,700 \text{ hours (one-time burden)} / 3 = 900 \text{ hours annualized}$

**ANNUALIZED IN-HOUSE COST: \$59,292**

The Commission assumes that respondents will use in-house personnel whose pay is comparable to senior-level federal employees (GS-14/5 at \$65.88 per hour) to retain each record of registration information, certification, and consent.

$900 \text{ hours annualized} \times \$65.88 / \text{hour} = \$59,292$

**(12) VRS Providers Retaining Records of Registration Information, Certification, and Consent for New Enterprise and Public Videophones**

Each respondent will retain a record of registration information, certification, and consent from the responsible individual for each new enterprise and public videophone.

**ANNUAL NUMBER OF RESPONDENTS: 5**

$5 \text{ VRS providers}^{70}$

**ANNUAL NUMBER OF RESPONSES: 5,000**

The Commission estimates that there will be approximately 5,000 new enterprise and public videophones annually, and thus 1,000 responses annually on average for each of the 5 respondents.

$5 \text{ respondents} \times 1,000 \text{ responses} = 5,000 \text{ responses annually}$

---

<sup>69</sup> These are the same 5 VRS providers identified in subsection (A). Annualizing creates a subset of the 5 providers.

<sup>70</sup> Each of the subsections that refer to VRS providers are referring to the same 5 VRS providers identified in subsection (A).

**ANNUAL BURDEN HOURS: 250 hours**

The Commission estimates that each respondent will require .05 hour (3 minutes) to retain each record of registration, certification, and consent.

$$5,000 \text{ response} \times 0.05 \text{ hour / response} = 250 \text{ hours}$$

**ANNUAL IN-HOUSE COST: \$16,470**

The Commission assumes that respondents will use in-house personnel whose pay is comparable to senior-level federal employees (GS-14/5 at \$65.88 per hour) to retain each record of registration information, certification, and consent.

$$250 \text{ hours} \times \$65.88 / \text{hour} = \$16,470$$

**CUMULATIVE TOTALS (for E):**

**TOTAL ANNUAL NUMBER OF RESPONDENTS: 34,005**

$$5^{71} + 10,000^{72} + 1,000^{73} + 18,000 + 5,000 = 34,005$$

**TOTAL ANNUAL NUMBER OF RESPONSES: 102,000**

$$10,000 + 10,000 + 1,000 + 1,000 + 10,000 + 1,000 + 18,000 + 18,000 + 5,000 + 5,000 + 18,000 + 5,000 = 102,000$$

**TOTAL ANNUAL BURDEN HOURS: 58,700**

$$5,000 + 5,000 + 500 + 500 + 50 + 18,000 + 18,000 + 5,000 + 5,000 + 900 + 250 = 58,700$$

**TOTAL ANNUAL IN-HOUSE COSTS: \$3,504,816**

$$\begin{aligned} \$329,400 + \$0 + \$32,940 + \$0 + \$32,940 + \$3,294 + \$1,185,840 + \$1,185,840 + \$329,400 \\ + \$329,400 + \$59,292 + \$16,470 = \$3,504,816 \end{aligned}$$

**(F) TRS-URD Per-Call Validation for VRS.**

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.

**ANNUALIZED NUMBER OF RESPONDENTS: 2**

$$5 \text{ VRS providers}^{74} / 3 \text{ years} = 1.67 \text{ (rounded to 2)}$$

**ANNUALIZED NUMBER OF RESPONSES: 2**

$$1 \text{ response} \times 5 \text{ respondents} = 5 \text{ responses} / 3 = 1.67 \text{ responses (rounded to 2)}$$

---

<sup>71</sup> Each of the subsections that refer to VRS providers are referring to the same 5 VRS providers identified in subsection (A) or a subset of these same 5 providers.

<sup>72</sup> These are the same 10,000 VRS user respondents that are identified in subsection (D)(2).

<sup>73</sup> These are the same 1,000 hearing point-to-point video user respondents that are identified in subsection (D)(4).

<sup>74</sup> These are the same 5 VRS providers identified in subsection (A). Annualizing creates a subset of the 5 providers.

**ANNUALIZED BURDEN HOURS: 500**

5 responses x 300 hours / response = 1,500 hours / 3 = 500 hours annualized

**ANNUALIZED IN-HOUSE COST: \$32,940**

The Commission assumes that respondents will use in-house personnel whose pay is comparable to senior-level federal employees (GS-14/5 at \$65.88 per hour) for the development of 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.

1,500 hours x \$65.88/hour = \$98,820/3 = \$ 32,940

**(G) Removal of Users from the TRS-URD.**

**(1) VRS Providers Submitting Requests to the Administrator for VRS Users**

Each respondent will 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**

5 VRS providers<sup>75</sup>

**ANNUAL NUMBER OF RESPONSES: 5,000**

The Commission estimates that on average each respondent will remove 1,000 users annually.

5 respondents x 1,000 users / respondent = 5,000 users

**ANNUAL BURDEN HOURS: 500 hours**

The Commission estimates that each respondent will require approximately 0.1 hour (6 minutes) to submit the request to remove each user.

5,000 users x 0.1 hour / user = 500 hours

**ANNUAL IN-HOUSE COST: \$32,940**

The Commission assumes that respondents will use in-house personnel whose pay is comparable to senior-level federal employees (GS-14/5 at \$65.88 per hour) to submit requests 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.

500 hours x \$65.88 / hour = \$32,940

**(2) VRS Providers Submitting Requests to the Administrator for Point-to-Point Video Users**

Each respondent will 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**

5 VRS providers<sup>76</sup>

**ANNUAL NUMBER OF RESPONSES: 500**

<sup>75</sup> These are the same 5 VRS providers identified in subsection (A).

<sup>76</sup> These are the same 5 VRS providers identified in subsection (A).

**Structure and Practices of the Video Relay Service Program; Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities, CG Docket Nos. 10-51 & 03-123**

The Commission estimates that 100 point-to-point video users on average will need to be removed from the TRS-URD annually for each respondent.

5 respondents x 100 point-to-point video users / respondent = 500

**ANNUAL BURDEN HOURS: 50 hours**

The Commission estimates that each respondent will require 0.1 hour (6 minutes) to submit each request to the administrator.

500 responses x 0.1 hour / response = 50 hours

**ANNUAL IN-HOUSE COST: \$3,294**

The Commission assumes that respondents will use in-house personnel whose pay is comparable to senior-level federal employees (GS-14/5 at \$65.88 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.

50 hours x \$65.88 / hour = \$3,294

**(3) VRS Providers Submitting Requests to the Administrator for Enterprise and Public Videophones**

VRS Providers must notify the TRS Fund administrator when a registered enterprise or public videophone is removed or permanently disconnected from VRS.

**ANNUAL NUMBER OF RESPONDENTS: 5**

5 VRS Providers<sup>77</sup>

**ANNUAL NUMBER OF RESPONSES: 2,500**

The Commission estimates that on average, 500 videophones per provider may be removed or disconnected annually.

5 respondents x 500 videophones / respondent = 2,500 videophones annually

**ANNUAL BURDEN HOURS: 250 hours**

The Commission estimates that each respondent will require approximately 0.1 hour (6 minutes) to inform the TRS Fund administrator of each removal or disconnection.

2,500 videophones x 0.1 hour / videophone = 250 hours

**ANNUAL IN-HOUSE COST: \$16,470**

The Commission assumes that respondents will use in-house personnel whose pay is comparable to senior-level federal employees (GS-14/5 at \$65.88 per hour) to submit information to the TRS Fund administrator concerning the removal or disconnection of videophones.

250 hours x \$65.88/ hour = \$16,470

**CUMULATIVE TOTALS (for G):**

**TOTAL ANNUAL NUMBER OF RESPONDENTS: 5<sup>78</sup>**

**TOTAL ANNUAL NUMBER OF RESPONSES: 8,000**

5,000 + 500 + 2,500 = 8,000

**TOTAL ANNUAL BURDEN HOURS: 800**

<sup>77</sup> These are the same 5 VRS providers identified in subsection (A).

<sup>78</sup> Each of the subsections refer to the same 5 VRS providers identified in subsection (A).

$500 + 50 + 250 = 800$

**TOTAL ANNUAL IN-HOUSE COSTS: \$52,704**

$\$32,940 + \$3,294 + \$16,470 = \$52,704$

**(H) Assignment of User's Unique Identifier.**

(1) VRS Providers Obtaining Identifiers for New VRS Users

Each provider obtains a unique identifier for each new VRS user from the TRS-URD.

**ANNUAL NUMBER OF RESPONDENTS: 5**

5 VRS providers<sup>79</sup>

**ANNUAL NUMBER OF RESPONSES: 10,000**

The Commission estimates that there will be 10,000 new VRS users annually.

$10,000 \text{ new users} \times 1 \text{ response / new user} = 10,000$

**ANNUAL BURDEN HOURS: 500 hours**

The Commission estimates that each provider will require approximately .05 hour (3 minutes to obtain each unique identifier.

$10,000 \text{ users} \times .05 \text{ hour / user} = 500 \text{ hours}$

**ANNUAL IN-HOUSE COST: \$32,940**

The Commission assumes that the providers will use in-house personnel whose pay is comparable to senior-level federal employees (GS-14/5 at \$65.88 per hour) to obtain unique identifiers from the TRS-URD.

$500 \text{ hours} \times \$65.88 / \text{hour} = \$32,940$

(2) VRS Providers Obtaining Identifiers for New Hearing Point-to-Point Video Users

Each provider will obtain a unique identifier for each hearing point-to-point video user from the TRS-URD.

**ANNUAL NUMBER OF RESPONDENTS: 5**

5 VRS Providers<sup>80</sup>

**ANNUAL NUMBER OF RESPONSES: 1,000**

The Commission estimates that there will be 1,000 new users each year.

$1,000 \text{ users} \times 1 \text{ response / user} = 1,000$

**ANNUAL BURDEN HOURS: 250 hours**

The Commission estimates that each provider will require approximately .05 hour (3 minutes) to obtain an identifier for each user.

$1,000 \text{ users} \times .05 \text{ hour / user} = 50$

**ANNUAL IN-HOUSE COST: \$3,294**

The Commission assumes that the providers will use in-house personnel whose pay is comparable to senior-level federal employees (GS-14/5 at \$65.88 per hour) to obtain unique identifiers from the TRS-URD.

$50 \text{ hours} \times \$65.88 / \text{hour} = \$3,294$

---

<sup>79</sup> These are the same 5 VRS providers identified in subsection (A).

<sup>80</sup> These are the same 5 VRS providers identified in subsection (A).

**Structure and Practices of the Video Relay Service Program; Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities, CG Docket Nos. 10-51 & 03-123**

**(3) VRS Providers Obtaining Identifiers for Existing Enterprise and Public Videophones**

Each provider obtains a unique identifier for each enterprise and public videophone from the TRS-URD.

**ANNUALIZED NUMBER OF RESPONDENTS: 2**

5 VRS providers<sup>81</sup> / 3 = 1.67 (rounded to 2)

**ANNUALIZED NUMBER OF RESPONSES: 18,000**

The Commission estimates that there are 54,000 existing enterprise and public videophones. 54,000 existing enterprise and public videophones x 1 response / videophone = 54,000 / 3 = 18,000 responses annualized

**ANNUAL BURDEN HOURS: 900 hours**

The Commission estimates that each provider will require approximately 0.05 hour (3 minutes to obtain each unique identifier.

54,000 users x 0.05 hour / user = 2,700 hours / 3 = 900 hours annualized

**ANNUAL IN-HOUSE COST: \$59,292**

The Commission assumes that the providers will use in-house personnel whose pay is comparable to senior-level federal employees (GS-14/5 at \$65.88 per hour) to obtain unique identifiers from the TRS-URD.

900 hours x \$65.88 / hour = \$59,292

**(4) VRS Providers Obtaining Identifiers for New Enterprise and Public Videophones**

Each provider obtains a unique identifier for each new enterprise and public videophone from the TRS-URD.

**ANNUAL NUMBER OF RESPONDENTS: 5**

5 VRS providers<sup>82</sup>

**ANNUAL NUMBER OF RESPONSES: 5,000**

The Commission estimates that there will be 5,000 new enterprise and public videophones annually.

5,000 new enterprise and public videophones annually x 1 response / videophone = 5,000

**ANNUAL BURDEN HOURS: 250 hours**

The Commission estimates that each provider will require approximately .05 hour (3 minutes to obtain each unique identifier from the TRS-URD.

5,000 users x .05 hour / user = 250 hours

**ANNUAL IN-HOUSE COST: \$65.88**

The Commission assumes that the providers will use in-house personnel whose pay is comparable to senior-level federal employees (GS-14/5 at \$65.88 per hour) to obtain unique identifiers from the TRS-URD.

250 hours x \$65.88 / hour = \$16,470

**CUMULATIVE TOTALS (for H):**

---

<sup>81</sup> These are the same 5 VRS providers identified in subsection (A). Annualizing creates a subset of the 5 providers.

<sup>82</sup> These are the same 5 VRS providers identified in subsection (A).

**TOTAL ANNUAL NUMBER OF RESPONDENTS: 5<sup>83</sup>**

**TOTAL ANNUAL NUMBER OF RESPONSES: 34,000**

**TOTAL ANNUAL BURDEN HOURS: 1,900 hours**

**TOTAL ANNUAL IN-HOUSE COSTS: \$111,996**

**(I) Verification of Orders for Change of Default TRS Providers.**

Each provider will, on an on-going basis, 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**

5 VRS providers<sup>84</sup>

**ANNUAL NUMBER OF RESPONSES: 5,000**

The Commission estimates that each respondent will process on average 1,000 changes of default TRS provider, for VRS users, hearing point-to-point video users, and enterprise and public videophones combined.

5 respondents x 1,000 responses / respondent = 5,000 responses

**ANNUAL BURDEN HOURS: 2,500 hours**

0.5 hour (30 minutes) to process each change of default TRS provider.

5,000 responses x 0.5 hour / response = 2,500 hours

**ANNUAL IN-HOUSE COST: \$164,700**

The Commission assumes that the providers will use in-house personnel whose pay is comparable to senior-level federal employees (GS-14/5 at \$65.88 per hour) to process the verification of orders for change of default provider.

2,500 hours x \$65.88 / hour = \$164,700

**(J) Retention of Authorization of Orders for Change of Default TRS 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<sup>85</sup>

**ANNUAL NUMBER OF RESPONSES: 5,000**

The Commission estimates that each respondent will process on average 1,000 changes of default TRS providers.

5 respondents x 1,000 responses / respondent = 5,000

**ANNUAL BURDEN HOURS: 500 hours**

---

<sup>83</sup> Each of the subsections refer to the same 5 VRS providers identified in subsection (A) or a subset of these same 5 providers.

<sup>84</sup> These are the same 5 VRS providers identified in subsection (A).

<sup>85</sup> These are the same 5 VRS providers identified in subsection (A).

**Structure and Practices of the Video Relay Service Program; Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities, CG Docket Nos. 10-51 & 03-123**

The Commission estimates that the new default provider will require approximately 0.1 hour (6 minutes) to retain each authorization of change order.

$$5,000 \text{ responses} \times 0.1 \text{ hour / response} = 500 \text{ hours}$$

**ANNUAL IN-HOUSE COST: \$32,940**

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 at \$65.88 per hour) to retain authorization of change orders for a minimum period of five years.

$$500 \text{ hours} \times \$65.88 / \text{hour} = \$32,940$$

**(K) Notice of the Transfer or Sale of TRS Users.**

Each respondent will, on an on-going basis, 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<sup>86</sup>

**ANNUAL NUMBER OF RESPONSES: 150,000**

The Commission estimates that the respondent will notify approximately 150,000 users, including VRS users, hearing point-to-point video users, and the responsible individuals for enterprise and public videophones.

$$1 \text{ respondent} \times 150,000 \text{ responses / respondent} = 150,000 \text{ responses}$$

**ANNUAL BURDEN HOURS: 22,500 hours**

The Commission estimates that the respondent will require approximately 0.15 hour (9 minutes) to prepare and send the notices.

$$150,000 \text{ responses} \times 0.15 \text{ hour / response} = 22,500 \text{ hours}$$

**ANNUAL IN-HOUSE COST: \$1,482,300**

The Commission assumes that each respondent will use in-house personnel whose pay is comparable to senior-level federal employees (GS-14/5 at \$65.88 per hour) to prepare and send advance notice to each affected user.

$$22,500 \text{ hours} \times \$65.88 / \text{hour} = \$1,482,300$$

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

Each respondent will, on an on-going basis, 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<sup>87</sup>

**ANNUAL NUMBER OF RESPONSES: 120**

The Commission estimates that each respondent will be required to submit on average 24 proofs of verification of the default provider change each year.

---

<sup>86</sup> This provider is a subset of the 5 VRS providers identified in subsection (A).

<sup>87</sup> These are the same 5 VRS providers identified in subsection (A).

**Structure and Practices of the Video Relay Service Program; Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities, CG Docket Nos. 10-51 & 03-123**

5 respondents x 24 proofs of verification / respondent = 120 responses

**ANNUAL BURDEN HOURS: 30 hours**

The Commission estimates that each respondent will require approximately 0.25 hour (15 minutes) to prepare and send to the Commission a copy of each requested proof of verification. 120 responses x 0.25 hour / response = 30 hours

**ANNUAL IN-HOUSE COST: \$1,976.40**

The Commission assumes that each respondent will use in-house personnel whose pay is comparable to senior-level federal employees (GS-14/5 at \$65.88 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.

30 hours x \$65.88 / hour = \$1,976.40

**(M) Identify VRS Minutes Attributable to Unauthorized Change.**

Each respondent (the allegedly unauthorized provider) will, on an on-going basis, 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<sup>88</sup>

**ANNUAL NUMBER OF RESPONSES: 120**

The Commission estimates that there will be on average 24 allegations of unauthorized default provider changes for each respondent annually.

5 respondents x 24 allegations / respondent = 120

**ANNUAL BURDEN HOURS: 60 hours**

The Commission estimates that each respondent (the allegedly unauthorized provider) will require approximately 0.5 hour (30 minutes) to identify to the TRS Fund administrator all minutes submitted for reimbursement attributable to the allegedly unauthorized changes. 120 responses x 0.5 hour / response = 60 hours

**ANNUAL IN-HOUSE COST: \$3,952.80**

The Commission assumes that each respondent will use in-house personnel whose pay is comparable to senior-level federal employees (GS-14/5 at \$65.88 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. 60 hours x \$65.88 / hour = \$3,952.80

**(N) Access to CPNI.**

Each respondent will 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. The Commission estimates that there will be 15 respondents, as follows:

- o 5 respondents provide VRS;<sup>89</sup>
- o 3 respondents provide Internet Protocol Captioned Telephone Service (IP CTS);<sup>90</sup>

---

<sup>88</sup> These are the same 5 VRS providers identified in subsection (A).

<sup>89</sup> These are the same 5 VRS providers identified in subsection (A).

**Structure and Practices of the Video Relay Service Program; Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities, CG Docket Nos. 10-51 & 03-123**

- o 1 respondent provides IP CTS, IP Relay, traditional TTY-based TRS (traditional TRS), Captioned Telephone Service (CTS), and Speech-to-Speech service (STS);
- o 1 respondent provides IP CTS, traditional TRS, CTS, and STS; and
- o The Commission estimates that there may be up to 5 respondents filing applications to provide TRS as new market entrants, of which 3 respondents have already filed applications to provide IP CTS.

**ANNUAL NUMBER OF RESPONDENTS: 15**

15 TRS providers<sup>91</sup>

**ANNUAL NUMBER OF RESPONSES: 180**

The Commission estimates that each respondent will receive on average 12 requests from the TRS Fund administrator or the Commission.

15 respondents x 12 requests / respondent = 180

**ANNUAL BURDEN HOURS: 180 hours**

The Commission estimates that each respondent will require approximately 1 hour to prepare its response.

180 responses x 1 hour / response = 180 hours

**ANNUAL IN-HOUSE COST: \$11,858.40**

The Commission assumes that each respondent will use in-house personnel whose pay is comparable to senior-level federal employees (GS-14/5 at \$65.88 per hour) to prepare a response to the Fund administrator's or the Commission's request to disclose, or permit access to CPNI.

180 hours x \$65.88 = \$11,858.40

**(O) Approval Required for Use of CPNI.**

**(1) TRS Providers Obtaining Approvals**

Each respondent will, on an on-going basis, 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: 15**

15 TRS providers<sup>92</sup>

**ANNUAL NUMBER OF RESPONSES: 450,000**

The Commission estimates that each respondent will need to obtain on average approval from users on average 30,000 times annually. This assumption is based on obtaining approval from some users multiple times and other users not at all.

15 respondents x 30,000 responses / respondent = 450,000 responses

**ANNUAL BURDEN HOURS: 45,000 hours**

The Commission estimates that each respondent will require approximately 0.1 hour (6 minutes) to obtain approval from each affected user.

450,000 responses x 0.1 hour / response = 45,000 hours

---

<sup>90</sup> One of the respondents that provides IP CTS is a wholly-owned subsidiary of a respondent that provides VRS.

<sup>91</sup> 5 of these 15 TRS providers are the same 5 VRS providers identified in subsection (A).

<sup>92</sup> These are the same 15 TRS providers identified in subsection (N). 5 of these 15 TRS providers are the same 5 VRS providers identified in subsection (A).

**ANNUAL IN-HOUSE COST: \$2,964,600**

The Commission assumes that each respondent will use in-house personnel whose pay is comparable to senior-level federal employees (GS-14/5 at \$65.88 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.

$$45,000 \text{ hours} \times \$65.88 / \text{hour} = \$2,964,600$$

(2) TRS Users Providing Approvals

**ANNUAL NUMBER OF RESPONDENTS: 150,000**

The Commission estimates that there will be 150,000 user respondents.<sup>93</sup>

**ANNUAL NUMBER OF RESPONSES: 450,000**

The Commission estimates that each respondent will need to give approval on average 3 times each year. We assume that some users will give consent multiple times and other users may not be asked to give consent at all.

$$150,000 \text{ respondents} \times 3 \text{ approvals} = 450,000 \text{ approvals}$$

**ANNUAL BURDEN HOURS: 45,000 hours**

The Commission estimates that each user respondent will require approximately 0.1 hour (6 minutes) to give approval.

$$450,000 \text{ responses} \times 0.1 \text{ hour} / \text{response} = 45,000 \text{ hours}$$

**ANNUAL IN-HOUSE COST: \$0**

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

**CUMULATIVE TOTALS (for O):**

**TOTAL ANNUAL NUMBER OF RESPONDENTS: 150,015<sup>94</sup>**

**TOTAL ANNUAL NUMBER OF RESPONSES: 900,000**

**TOTAL ANNUAL BURDEN HOURS: 90,000**

**TOTAL ANNUAL IN-HOUSE COSTS: \$2,964,600**

**(P) Notice Required for Use of CPNI.**

Each respondent will, on an on-going basis, 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: 15**

15 TRS providers<sup>95</sup>

**ANNUAL NUMBER OF RESPONSES: 450,000**

The Commission estimates that each respondent will notify on average 30,000 users each year.

<sup>93</sup> These 150,000 user respondents are a subset of all TRS users.

<sup>94</sup> 15 of these respondents are the same 15 TRS providers identified in subsection (N). 5 of these 15 TRS providers are the same 5 VRS providers identified in subsection (A).

<sup>95</sup> These are the same 15 TRS providers identified in subsection (N). 5 of these 15 TRS providers are the same 5 VRS providers identified in subsection (A).

15 respondents x 30,000 users / respondent = 450,000

**ANNUAL BURDEN HOURS: 90,000 hours**

The Commission estimates that each respondent will require approximately 0.2 hour (12 minutes) to notify each user.

450,000 responses x 0.2 hour / response = 90,000 hours

**ANNUAL IN-HOUSE COST: \$5,929,200**

The Commission assumes that each respondent will use in-house personnel whose pay is comparable to senior-level federal employees (GS-14/5 at \$65.88 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.

90,000 hours x \$65.88 = \$5,929,200

**(Q) Safeguards Required for Use of CPNI.**

Each respondent will 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 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: 15**

15 TRS providers<sup>96</sup>

**ANNUAL NUMBER OF RESPONSES: 15**

15 respondents x 1 response / respondent = 15

**ANNUAL BURDEN HOURS: 600 hours**

The Commission estimates that each respondent will require approximately 40 hours annually to maintain the records of marketing campaigns that use their customers' CPNI and to prepare and submit a report to the Commission as described above.

15 responses x 40 hours / response = 600 hours

**ANNUAL IN-HOUSE COST: \$39,528**

The Commission assumes that each respondent will use in-house personnel whose pay is comparable to senior-level federal employees (GS-14/5 at \$65.88 per hour) to maintain records of marketing campaigns that use their customers' CPNI and to prepare and submit a report to the Commission as described above.

600 hours x \$65.88 = \$39,528

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

<sup>96</sup> These are the same 15 TRS providers identified in subsection (N). 5 of these 15 TRS providers are the same 5 VRS providers identified in subsection (A).

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: 15**

15 TRS providers<sup>97</sup>

**ANNUAL NUMBER OF RESPONSES: 15,000**

1,000 responses on average per respondent x 15 respondents = 15,000

**ANNUAL BURDEN HOURS: 3,000**

0.2 hour per response x 15,000 responses = 3,000

**ANNUAL IN-HOUSE COST: \$197,640**

The Commission assumes that each respondent will use in-house personnel whose pay is comparable to senior-level federal employees (GS-14/5 at \$65.888 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.

3,000 hours x \$65.88/hour = \$197,640

**(S) Notifications 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: 15**

15 TRS providers<sup>98</sup>

**ANNUAL NUMBER OF RESPONSES: 30**

2 responses / respondent x 15 respondents = 30

**ANNUAL BURDEN HOURS: 120**

4 hours / response x 30 responses = 120

**ANNUAL IN-HOUSE COST: \$7,905.60**

The Commission assumes that each respondent will use in-house personnel whose pay is comparable to senior-level federal employees (GS-14/5 at \$65.88 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

---

<sup>97</sup> These are the same 15 TRS providers identified in subsection (N). 5 of these 15 TRS providers are the same 5 VRS providers identified in subsection (A).

<sup>98</sup> These are the same 15 TRS providers identified in subsection (N). 5 of these 15 TRS providers are the same 5 VRS providers identified in subsection (A).

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.

120 hours x \$65.88 / hour = \$7,905.60

**(T) CPNI Obligations of Qualified DVC Entities.**

Qualified DVC Entities must safeguard any CPNI they obtain, comply with the Commission's requirements concerning the disclosure of CPNI, and notify the Commission of any CPNI security breaches.

**ANNUAL NUMBER OF RESPONDENTS: 6**

The Commission estimates that there will be 6 Qualified DVC Entities.

**ANNUAL NUMBER OF RESPONSES: 6**

6 respondents x 1 response / respondent = 6

**ANNUAL BURDEN HOURS: 180**

The Commission estimates that each respondent will spend 30 hours each year on CPNI-related tasks.

6 responses x 30 hours / response = 180 hours

**ANNUAL IN-HOUSE COST: \$11,858.40**

The Commission assumes that each respondent will use in-house personnel whose pay is comparable to senior-level federal employees (GS-14/5 at \$65.88 per hour).

180 hours x \$65.88 / hour = \$11,858.40

**(U) At-home VRS call handling monitoring and oversight.**

(i) Each VRS provider participating in at-home VRS call handling will need to inspect and approve each at-home workstation of the 50 estimated CAs that each provider will add each year on average.

**ANNUAL NUMBER OF RESPONDENTS: 5**

5 VRS providers<sup>99</sup> will equip at-home workstations.

**ANNUAL NUMBER OF RESPONSES: 250**

1 workstation x 50 CAs x 5 respondents = 250 responses

**ANNUAL BURDEN HOURS: 1,000 hours**

The Commission estimates that each inspection will take 4 hours per workstation.

4 hours x 250 responses = 1,000 hours

**ANNUAL IN-HOUSE COST: \$65,880**

The Commission assumes that respondents will use "in-house" personnel whose pay is comparable to senior level federal employees (GS-14/5 at \$65.88 per hour) to inspect and approve each at-home workstation.

1,000 hours x \$65.88/hour = \$65,880

(ii) The respondents will need to assign a unique call center identification number to each of the estimated new 250 at-home workstations added annually and use the number to identify all minutes handled from each such workstation in its call detail records.

**ANNUAL NUMBER OF RESPONDENTS: 5**

---

<sup>99</sup> These are the same 5 VRS providers identified in subsection (A).

5 VRS providers<sup>100</sup> will assign a unique call center identification number to each of the estimated 50 at-home workstations added annually on average per provider and use the number to identify all minutes handled from each such workstation in its call detail records.

**ANNUAL NUMBER OF RESPONSES: 250**

1 call center identification number x 50 workstations x 5 respondents)

**ANNUAL BURDEN HOURS: 25**

The Commission estimates that each respondent will require approximately 0.1 hour (6 minutes) to assign the call center identification number.

0.1 hours x 250 responses = 25

**ANNUAL IN-HOUSE COST: \$1,647**

The Commission assumes that respondents will use “in-house” personnel whose pay is comparable to senior level federal employees (GS-14/5 or \$65.88 per hour) to assign a unique call center identification number to each of the estimated 50 workstations per provider and use the number to identify all minutes handled from each such workstation in its call detail records.

25 hours x \$65.88 per hour = \$1,647

- (iii) Each respondent will need to keep all records pertaining to its at-home workstations for a minimum of five years. The Commission estimates that each provider will have on average approximately 200 at-home workstations.

**ANNUAL NUMBER OF RESPONDENTS: 5**

5 VRS providers.<sup>101</sup>

**ANNUAL NUMBER OF RESPONSES: 1,000**

200 workstations x 5 respondents = 1,000 responses

**ANNUAL BURDEN HOURS: 100 hours**

The Commission estimates that each respondent will require approximately 0.1 hour (6 minutes) to keep the records for each at-home workstation for a minimum of five years. 0.1 hours x 1,000 responses = 100 hours

**ANNUAL IN-HOUSE COST: \$6,588**

100 hours x \$65.88 per hour = \$6,588

- (iv) Each respondent will conduct inspections annually of at least five percent of the estimated 200 at-home workstations on average per provider.

**ANNUAL NUMBER OF RESPONDENTS: 5**

5 VRS providers<sup>102</sup>

**ANNUAL NUMBER OF RESPONSES: 50**

200 workstations x 5% x 5 respondents = 50

**ANNUAL BURDEN HOURS: 200 hours**

---

<sup>100</sup> These are the same 5 VRS providers identified in subsection (A).

<sup>101</sup> These are the same 5 VRS providers identified in subsection (A).

<sup>102</sup> These are the same 5 VRS providers identified in subsection (A).

The Commission estimates that each respondent will require approximately 4 hours per workstation inspection.

4 hours x 50 responses = 200 hours

**ANNUAL IN-HOUSE COST: \$13,176**

The Commission assumes that respondents will use “in-house” personnel whose pay is comparable to senior level federal employees (GS-14/5 or \$65.88 per hour) to conduct inspections of at least five percent of the estimated 200 at-home workstations on average per provider.

200 hours x \$65.88 per hour = \$13,176

**CUMULATIVE TOTALS (for U):**

**TOTAL ANNUAL NUMBER OF RESPONDENTS: 5<sup>103</sup>**

**TOTAL ANNUAL NUMBER OF RESPONSES: 1,550**

**TOTAL ANNUAL BURDEN HOURS: 1,325**

**TOTAL ANNUAL IN-HOUSE COSTS: \$87,291**

**(V) At-home VRS call handling monthly reports.**

Each respondent will need to include with its monthly requests for compensation: the home workstation 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 call center ID, street address, and the name of the supervisor of the call center responsible for oversight of that workstation.

**ANNUAL NUMBER OF RESPONDENTS: 5**

5 VRS providers<sup>104</sup>

**ANNUAL NUMBER OF RESPONSES: 60**

5 VRS providers x 1 input of data into each monthly report x 12 monthly reports = 60

**ANNUAL BURDEN HOURS: 30 hours**

The Commission estimates that each respondent will require 0.50 hours (30 minutes) to include the information discussed above with its monthly request for compensation.

60 responses x 0.50 hours = 30 hours

**ANNUAL IN-HOUSE COST: \$1,976.40**

The Commission assumes that respondents will use “in-house” personnel whose pay is comparable to senior level federal employees (GS-14/5 or \$65.88 per hour) to include the requisite information within their monthly requests for compensation.

30 hours x \$65.88 per hour = \$1,976.40

**(W) State Relay Certification Applications**

---

<sup>103</sup> Each of the subsections refer to the same 5 VRS providers identified in subsection (A).

<sup>104</sup> These are the same 5 VRS providers identified in subsection (A).

**Structure and Practices of the Video Relay Service Program; Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities, CG Docket Nos. 10-51 & 03-123**

Although respondents will incur the burdens estimated in this section every 5 years, for purposes of cumulative burden estimates, these estimates are annualized as a one-time burden over the three-year period for which the Commission seeks approval for this collection.

**ANNUALIZED NUMBER OF RESPONDENTS = 19**

The Commission estimates that there will be 56 respondents (50 states and 6 territories) who would submit state relay certification applications. These entities must renew their certifications once every 5 years. For the purposes of this information collection, the Commission treats this requirement as a one-time requirement for each respondent during the three-year period of this renewal. Thus, the number of respondents is 56 total for the 3 years.

$$56 \text{ respondents} / 3 \text{ years} = 18.67 \text{ (rounded to 19)}$$

**ANNUALIZED NUMBER OF RESPONSES = 19**

$$19 \text{ respondents} \times 1 \text{ response} = 19$$

**ANNUALIZED BURDEN HOURS = 285 hours**

The Commission estimates that respondents will require 15 hours to complete the certification application.

$$15 \text{ hours/respondent} \times 19 \text{ respondents} = 285 \text{ hours}$$

**ANNUALIZED IN-HOUSE COST = \$22,084.65**

The Commission assumes that respondents will use in-house personnel whose pay is comparable to senior level federal employees (GS-15/5 at \$77.49/hour) to complete the application for certification.

$$285 \text{ hours} \times \$77.49/\text{hour} = \$22,085$$

**(X) Internet-Based TRS Provider Certification.**

Although respondents will incur the burdens estimated in this section every 5 years, for purposes of cumulative burden estimates, these estimates are annualized as a one-time burden over the three-year period for which the Commission seeks approval for this collection.

**ANNUALIZED NUMBER OF RESPONDENTS: 5**

The Commission estimates that there are 15 TRS providers (respondents),<sup>105</sup> as follows:

- 1 respondent provides IP CTS and IP Relay;
- 4 respondents provide IP CTS only;
- 5 respondents provide VRS only; and
- 5 respondents have applied or will apply to provide TRS as new market entrants. The Commission estimates that each of these 5 providers will provide only one service each.

$$15 \text{ total respondents} / 3 \text{ years} = 5^{106}$$

**ANNUALIZED NUMBER OF RESPONSES: 5**

The number of responses for each respondent will depend on the number of iTRS services provided by each respondent.

$$(1 \text{ respondent providing two forms of iTRS}) + (14 \text{ respondents providing 1 form of iTRS}) = 2 \text{ responses} + 14 \text{ responses} = 16 \text{ responses total for three years}$$

$$16 \text{ responses} / 3 \text{ years} = 5.33 \text{ (rounded to 5)}$$

---

<sup>105</sup> These are the same 15 TRS providers identified in subsection (N). 5 of these 15 TRS providers are the same 5 VRS providers identified in subsection (A).

<sup>106</sup> The 5 annualized respondents are a subset of the 15 TRS providers identified above.

**ANNUALIZED BURDEN HOURS: 200**

The Commission estimates that respondents will require approximately 30 hours per form of TRS (except for VRS) to complete the application for certification pursuant to the requirements listed above in 1(a), to demonstrate their ability to comply with the Commission's rules. In the case of VRS, the Commission estimates that respondents will require an additional 30 hours for the additional requirements that apply only to VRS applicants, as listed above in 1(a) and 1(c)(4)(a) (the portion of the application relating to at-home call handling). These applications will be completed on a one-time basis.

$$(10 \text{ non-VRS responses} \times 30 \text{ hours/response}) + (5 \text{ VRS responses} \times (30 \text{ hours/response} + 30 \text{ additional hours/response})) = 300 + 300 = 600 \text{ hours for the three years}$$

$$600 \text{ hours} / 3 \text{ years} = 200 \text{ hours}$$

**ANNUALIZED IN-HOUSE COST: \$15,498**

The Commission assumes that respondents will use in-house personnel whose pay is comparable to senior level federal employees (GS-15/5 at \$77.49/hour) to complete the application for certification.

$$200 \text{ hours} \times \$77.49/\text{hour} = \$15,498$$

**(Y) Qualified DVC Entity Registration.**

**ANNUAL NUMBER OF RESPONDENTS: 2**

The Commission estimates that there will be 2 Qualified DVC Entities<sup>107</sup> each year applying for authorization to access to the TRS Numbering Directory.

**ANNUAL NUMBER OF RESPONSES: 2**

Each respondent will be a new Qualified DVC Entity that will need to apply for authorization once.

$$2 \text{ new respondents each year} \times 1 \text{ registration / respondent} = 2$$

**ANNUAL BURDEN HOURS: 20 hours**

The Commission estimates that respondents will require approximately 10 hours per registration application to demonstrate their ability to comply with the Commission's rules.

$$2 \text{ responses} \times 10 \text{ hours / response} = 20 \text{ hours}$$

**ANNUAL IN-HOUSE COST: \$1,549.80**

The Commission assumes that respondents will use in-house personnel whose pay is comparable to senior level federal employees (GS-15/5 at \$77.49/hour) to complete the application for certification.

$$20 \text{ hours} \times \$77.49/\text{hour} = \$1,549.80$$

**(Z) Notification of Service Cessation for iTRS Providers.**

When an iTRS provider ceases to provide service, the iTRS provider is required to notify its customers at least 30 days in advance.<sup>108</sup>

**ANNUAL NUMBER OF RESPONDENTS: 1**

The Commission estimates that 1 iTRS provider will cease providing service each year.<sup>109</sup>

---

<sup>107</sup> These 2 Qualified DVC Entities are a subset of the 6 Qualified DVC Entities identified in subsection (T).

<sup>108</sup> VRS Certification Order, 26 FCC Rcd at 10922, para. 59.

**ANNUAL NUMBER OF RESPONSES: 1**

The Commission estimates that the 1 respondent will give 1 notice of service cessation.  
 $1 \text{ respondent} \times 1 \text{ response} = 1$

**ANNUAL BURDEN HOURS: 5**

The Commission estimates the respondent will require approximately 5 hours to notify its customers of the forthcoming service cessation.

$1 \text{ response} \times 5 \text{ hours/response} = 5 \text{ hours}$

**ANNUAL IN-HOUSE COSTS: \$387.45**

The Commission assumes that respondents will use in-house personnel whose pay is comparable to senior level federal employees (GS-15/5 at \$77.49/hour) to notify their customers of the service cessation.

$5 \text{ hours} \times \$77.49/\text{hour} = \$387.45$

**(AA) *Qualified DVC Entities Cessation of Service***

Qualified DVC Entities must notify the Commission when they cease providing services.

**ANNUAL NUMBER OF RESPONDENTS: 1**

The Commission estimates that up to 1 Qualified DVC Entity<sup>109</sup> will notify the Commission each year that it is terminating service.

**ANNUAL NUMBER OF RESPONSES: 1**

$1 \text{ respondent} \times 1 \text{ response} = 1 \text{ response}$

**ANNUAL BURDEN HOURS: 1 hour**

The Commission estimates each respondent will require approximately 1 hour to notify the Commission of the forthcoming service cessation.

$1 \text{ response} \times 1 \text{ hour / response} = 1 \text{ hour}$

**ANNUAL IN-HOUSE COSTS: \$77.49**

The Commission assumes that respondents will use in-house personnel whose pay is comparable to senior level federal employees (GS-15/5 at \$77.49/hour) to notify the Commission of the forthcoming service cessation.

$1 \text{ hour} \times \$77.49/\text{hour} = \$77.49$

**(AB) *Suspension or Revocation Proceeding***

**(1) TRS Providers**

Section 64.606(e) provides the procedures for TRS certifications to be suspended or revoked by the Commission. The Commission estimates that there will be up to 1 suspension or revocation proceeding per year.

**ANNUAL NUMBER OF RESPONDENTS: 1**

1 respondent out of 71 covered entities (56 state programs + 15 TRS providers)<sup>111</sup>

<sup>109</sup> This 1 iTRS provider is a subset of the 15 iTRS providers identified in subsection (N).

<sup>110</sup> This 1 Qualified DVC Entity is a subset of the 6 Qualified DVC Entities identified in subsection (T).

<sup>111</sup> The 1 respondent is a subset of the 56 state and U.S. territory programs identified in subsection (W) and the 15 TRS providers identified in subsection (N).

**Structure and Practices of the Video Relay Service Program; Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities, CG Docket Nos. 10-51 & 03-123**

**ANNUAL NUMBER OF RESPONSES: 1**

1 respondents x 1 response / respondent = 1

**ANNUAL BURDEN HOURS: 20 hours**

The Commission estimates that the state program or TRS provider subject to the suspension or revocation proceeding will use in-house personnel for 20 hours to coordinate a response with outside counsel.

20 hours / response x 1 response = 20 hours

**ANNUAL IN-HOUSE COST: \$1,549.80**

The Commission estimates that the state program or TRS provider will use in-house personnel whose pay is comparable to senior level federal employees (GS-15/5 at \$77.49/hour) to coordinate a response with outside counsel.

20 hours x \$77.49/hour = \$1,549.80

**(2) Qualified DVC Entities**

When the Commission proposes to terminate the authorization of a Qualified DVC Entity, the Qualified DVC Entity has an opportunity to contest the proposed termination. The Commission estimates that there will be up to 1 termination proceeding per year.

**ANNUAL NUMBER OF RESPONDENTS: 1**

1 respondent out of 6 Qualified DVC Entities<sup>112</sup>

**ANNUAL NUMBER OF RESPONSES: 1**

1 respondent x 1 response / respondent = 1

**ANNUAL NUMBER OF BURDEN HOURS: 5 hours**

The Commission estimates that the Qualified DVC Entity subject to a termination proceeding will use in-house personnel for 5 hours to coordinate a response with outside counsel.

1 response x 5 hours / response = 5 hours

**ANNUAL IN-HOUSE COST: \$387.45**

The Commission estimates that the Qualified DVC Entity will use in-house personnel whose pay is comparable to senior level federal employees (GS-15/5 at \$77.49/hour) to coordinate a response with outside counsel.

5 hours x \$77.49 / hour = \$387.45

**CUMULATIVE TOTALS (for AB):**

**TOTAL ANNUAL NUMBER OF RESPONDENTS: 2<sup>113</sup>**

**TOTAL ANNUAL NUMBER OF RESPONSES: 2**

**TOTAL ANNUAL BURDEN HOURS: 25 hours**

**TOTAL ANNUAL IN-HOUSE COSTS: \$1,937.25**

**(AC) *Notification of Substantive Change.***

<sup>112</sup> This 1 Qualified DVC Entity is a subset of the 6 Qualified DVC Entities identified in subsection (T).

<sup>113</sup> 1 respondent is a subset of the 56 state and U.S. territory programs identified in subsection (W) and the 15 TRS providers identified in subsection (N); and 1 respondent is a subset of the 6 Qualified DVC Entities identified in subsection (T).

**Structure and Practices of the Video Relay Service Program; Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities, CG Docket Nos. 10-51 & 03-123**

**(1) State TRS Programs and VRS and IP Relay Providers**

Section 64.606(f) provides the procedures for state TRS programs and VRS and IP Relay providers to notify the FCC of substantive changes.

**ANNUAL NUMBER OF RESPONDENTS: 12**

(6 out of 56 states and territories annually) + (all 5 VRS providers + 1 IP Relay provider) = 12 respondents<sup>114</sup>

**ANNUAL NUMBER OF RESPONSES: 24**

The Commission estimates that of the 56 states and territories, on average, there will be a total of 6 notifications of substantive change each year, and of the 6 VRS and IP Relay respondents, on average, there will be a total of 18 notifications of substantive change, on average, each year.

(6 on-occasion change notifications each year (on average)) + (18 on-occasion change notifications each year (on average)) = 24 responses / year

**ANNUAL BURDEN HOURS: 48 hours**

The Commission estimates that the respondents will use in-house personnel for 2 hours to provide each notification of substantive change.

24 responses x 2 hours / response = 48 hours

**ANNUAL IN-HOUSE COST: \$3,719.52**

The Commission estimates that the respondents will use in-house personnel whose pay is comparable to senior level federal employees (GS-15/5 at \$77.49/hour) to notify the FCC of substantive changes.

48 hours x \$77.49 / hour = \$3,719.52

**(2) Qualified DVC Entities**

A Qualified DVC Entity must notify the Commission whenever there is a material change to information that was provided on its application.

**ANNUAL NUMBER OF RESPONDENTS: 1**

The Commission estimates that 1 Qualified DVC Entity per year will need to notify the Commission of a material change.<sup>115</sup>

**ANNUAL NUMBER OF RESPONSES: 1**

1 respondent x 1 response / respondent = 1 response

**ANNUAL BURDEN HOURS: 1 hour**

The Commission estimates that the Qualified DVC Entity will spend 1 hour preparing its notification.

1 response x 1 hour / response = 1 hour

**ANNUAL IN-HOUSE COST: \$77.49**

---

<sup>114</sup> The 6 state program respondents are a subset of the 56 state and U.S. territory programs identified in subsection (W) and the 5 VRS providers and 1 IP Relay provider are a subset of the 15 TRS providers identified in subsection (N).

<sup>115</sup> The 1 Qualified DVC Entity is a subset of the 6 Qualified DVC Entities identified in subsection (T).

**Structure and Practices of the Video Relay Service Program; Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities, CG Docket Nos. 10-51 & 03-123**

The Commission estimates that the Qualified DVC Entity will use in-house personnel whose pay is comparable to senior-level federal employees (GS-15/5 at \$77.49 per hour) to draft the notification.

$$1 \text{ hour / year} \times \$77.49 / \text{hour} = \$77.49$$

**CUMULATIVE TOTALS (for AC):**

**TOTAL ANNUAL NUMBER OF RESPONDENTS: 13<sup>116</sup>**

**TOTAL ANNUAL NUMBER OF RESPONSES: 25**

**TOTAL ANNUAL BURDEN HOURS: 49 hours**

**TOTAL ANNUAL IN-HOUSE COSTS: \$3,797.01**

**(AD) *Submission of Annual Report and Compliance Plan.***

**(1) Submission of Annual Report**

The annual reporting requirement applies to each of the iTRS providers.

**ANNUAL NUMBER OF RESPONDENTS: 15**

15 iTRS providers<sup>117</sup>

**ANNUAL NUMBER OF RESPONSES: 16**

The Commission estimates that there will be 1 report filed by each iTRS provider that provides only 1 form of iTRS, and 2 reports filed by the sole iTRS provider that provides 2 forms of iTRS.

$$(14 \text{ responses} \times 1 \text{ respondent}) + (2 \text{ responses} \times 1 \text{ respondent}) = 16 \text{ responses/year}$$

**ANNUAL BURDEN HOURS: 400 hours**

The Commission estimates that each respondent will require approximately 25 hours to complete each annual report.

$$16 \text{ responses} \times 25 \text{ hours / response} = 400 \text{ hours}$$

**ANNUAL IN-HOUSE COST: \$30,996**

The Commission assumes that respondents will use in-house personnel whose pay is comparable to senior level federal employees (GS-15/5 at \$77.49/hour) to complete the report that include updates to the information that was provided in the original application.

$$400 \text{ hours} \times \$77.49 / \text{hour} = \$30,996$$

**(2) Submission of Compliance Plan**

**ANNUAL NUMBER OF RESPONDENTS: 5**

The compliance plan requirement applies only to the 5 VRS provider respondents.<sup>118</sup>

**ANNUAL NUMBER OF RESPONSES: 6**

---

<sup>116</sup> 6 respondents are a subset of the 56 state and U.S. territory programs identified in subsection (W) and the 5 VRS providers and 1 IP Relay provider are a subset of the 15 TRS providers identified in subsection (N); and 1 respondent is a subset of the 6 Qualified DVC Entities identified in subsection (T).

<sup>117</sup> These are the same 15 TRS providers identified in subsection (N). 5 of these 15 TRS providers are the same 5 VRS providers identified in subsection (A).

<sup>118</sup> These are the same 5 VRS providers identified in subsection (A).

**Structure and Practices of the Video Relay Service Program; Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities, CG Docket Nos. 10-51 & 03-123**

The Commission estimates that each VRS provider will submit 1 compliance plan, and that 1 provider would be requested to resubmit its compliance plan.

$(1 \text{ initial response/provider} \times 5 \text{ VRS providers}) + (1 \text{ resubmission} \times 1 \text{ VRS provider}) = 6 \text{ responses}$

**ANNUAL BURDEN HOURS: 90**

The Commission estimates that each respondent will take approximately 15 hours to complete a compliance plan, and if required, to resubmit a compliance plan.

$6 \text{ responses} \times 15 \text{ hours/response} = 90 \text{ hours}$

**ANNUAL IN-HOUSE COST: \$6,974.10**

The Commission assumes that respondents will use in-house personnel whose pay is comparable to senior level federal employees (GS-15/5 at \$77.49/hour) to complete the submission of the compliance report.

$90 \text{ hours} \times \$77.49/\text{hour} = \$6,974.10$

**CUMULATIVE TOTALS (for AD):**

**TOTAL ANNUAL NUMBER OF RESPONDENTS: 15<sup>119</sup>**

**TOTAL ANNUAL NUMBER OF RESPONSES: 16 + 6 = 22 responses**

**TOTAL ANNUAL BURDEN HOURS: 400 + 90 = 490 hours**

**TOTAL ANNUAL IN-HOUSE COSTS: \$30,996 + \$6,974.10 = \$37,970.10**

**(AE)      *Service Interruptions***

**(1) Prior Authorization for Voluntary Interruption of VRS**

**ANNUAL NUMBER OF RESPONDENTS: 5**

This rule applies to the 5 VRS provider respondents.<sup>120</sup>

**ANNUAL NUMBER OF RESPONSES: 5**

The Commission estimates that these providers will each seek prior authorization for a voluntary interruption of service approximately 1 time per year.

$5 \text{ respondents} \times 1 \text{ response/year} = 5 \text{ responses}$

**ANNUAL BURDEN HOURS: 5 hours**

The Commission estimates that each respondent will require approximately 1 hour to complete the submission of a written request for authorization for a voluntary interruption of service.

$5 \text{ responses/year} \times 1 \text{ hour/response} = 5 \text{ hours / year}$

**ANNUAL IN-HOUSE COST: \$387.45**

The Commission assumes that respondents will use in-house personnel whose pay is comparable to senior level federal employees (GS-15/5 at \$77.49/hour) to complete the submission of a written request for authorization for a voluntary interruption of service.

$5 \text{ hours/year} \times \$77.49/\text{hour} = \$387.45$

---

<sup>119</sup> These are the same 15 TRS providers identified in subsection (N). 5 of these 15 TRS providers are the same 5 VRS providers identified in subsection (A).

<sup>120</sup> These are the same 5 VRS providers identified in subsection (A).

**Structure and Practices of the Video Relay Service Program; Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities, CG Docket Nos. 10-51 & 03-123**

**(2) Reporting of Unforeseen Service Interruptions for iTRS**

**ANNUAL NUMBER OF RESPONDENTS: 15**

This rule applies to the 15 iTRS provider respondents.<sup>121</sup>

**ANNUAL NUMBER OF RESPONSES: 305**

The Commission estimates that the 15 iTRS providers will each be required to submit a written notification to the FCC's Consumer and Governmental Affairs Bureau within two business days of when a service interruption first occurred due to unforeseen circumstances, with an explanation of how the provision of its service had been restored or will be restored imminently. The Commission estimates that each respondent will experience approximately 20 service interruptions per year, on average, of which approximately 1 service interruption per provider will require the filing of a follow-up report within two business days of the restoration of service.

$$(15 \text{ iTRS providers} \times 20 \text{ reports per year}) + (5 \text{ iTRS providers} \times 1 \text{ follow-up report per year}) \\ = 300 + 5 = 305 \text{ responses}$$

**ANNUAL BURDEN HOURS: 305 hours**

The Commission estimates that each respondent will require approximately 1 hour to complete the submission of a written notification to the FCC's Consumer and Governmental Affairs Bureau within two business days of when the service interruption first occurred due to an unforeseen circumstance and approximately 1 hour to complete the submission of a follow-up report.

$$(15 \text{ iTRS providers} \times 20 \text{ reports per year} \times 1 \text{ hour}) + (5 \text{ iTRS providers} \times 1 \text{ follow-up report per year} \times 1 \text{ hour}) \\ = 300 \text{ hours} + 5 \text{ hours} = 305 \text{ hours}$$

**ANNUAL IN-HOUSE COST: \$23,634.45**

The Commission assumes that respondents will use in-house personnel whose pay is comparable to senior level federal employees (GS-15/5 at \$77.49/hour) to complete the submission of a written notification to the FCC's Consumer and Governmental Affairs Bureau.

$$305 \text{ hours} \times \$77.49/\text{hour} = \$23,634.45$$

**(3) Website Posting for Service Interruptions for iTRS Providers**

**ANNUAL NUMBER OF RESPONDENTS: 15**

This rule applies to all iTRS providers. The Commission estimates that 15 respondents will provide notification of service interruptions to consumers on an accessible website in a timely manner.<sup>122</sup>

**ANNUAL NUMBER OF RESPONSES: 300**

The Commission estimates that the 15 providers will each post 20 notifications per year.  
15 providers x 20 notifications = 300 responses

**ANNUAL BURDEN HOURS: 150 hours**

The Commission estimates each respondent will require approximately 0.50 hour (30 minutes) to post each notification on an accessible website.

---

<sup>121</sup> These are the same 15 TRS providers identified in subsection (N). 5 of these 15 TRS providers are the same 5 VRS providers identified in subsection (A).

<sup>122</sup> These are the same 15 TRS providers identified in subsection (N). 5 of these 15 TRS providers are the same 5 VRS providers identified in subsection (A).

**Structure and Practices of the Video Relay Service Program; Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities, CG Docket Nos. 10-51 & 03-123**

0.50 hour/response x 300 responses = 150 hours

**ANNUAL IN-HOUSE COST: \$11,610**

The Commission assumes that respondents will use in-house personnel whose pay is comparable to senior level federal employees (GS-15/5 at \$77.49/hour) to provide notifications of temporary service interruptions to consumers on an accessible website. 150 hours x \$77.49/hour = \$11,610

**CUMULATIVE TOTALS (for AE):**

**TOTAL ANNUAL NUMBER OF RESPONDENTS: 15<sup>123</sup>**

**TOTAL ANNUAL NUMBER OF RESPONSES: 610**

5 + 305 + 300 = 610

**TOTAL ANNUAL BURDEN HOURS: 460**

5 + 305 + 150 = 460

**TOTAL ANNUAL IN-HOUSE COSTS: \$35,631.90**

\$387.45 + \$23,634.45 + \$11,610 = \$35,631.90

**(AF) Routing Information**

**(1) Routing Information for VRS and IP Relay**

Currently, 5 entities provide VRS and 1 entity provides IP Relay service (a total of six 6 providers)<sup>124</sup> to approximately 200,000 VRS users and 30,000 IP Relay users for a total of 230,000 registered users.<sup>125</sup>

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

The Commission assumes that each provider will use in-house personnel whose pay is comparable to administrative level federal employees (GS-7/5), at a rate of \$26.43 per hour, to perform service-related tasks; in-house personnel whose pay is comparable to mid-level federal employees (GS-13/5), at a rate of \$55.75 per hour, to perform tasks involving system development, testing, deployment, and maintenance; and an in-house attorney whose pay is

---

<sup>123</sup> These are the same 15 TRS providers identified in subsection (N). 5 of these 15 TRS providers are the same 5 VRS providers identified in subsection (A).

<sup>124</sup> The 5 VRS providers are the same 5 VRS providers identified in subsection (A) and are also a subset of the 15 TRS providers identified in subsection (N). The 1 IP Relay provider is a subset of the 15 TRS providers identified in subsection (N).

<sup>125</sup> For purposes of this information collection, the term “user” or “registered user” means an individual who has registered with a VRS or IP Relay provider and has been assigned a ten-digit NANP number for VRS or IP Relay services. An individual may register with multiple VRS and IP Relay providers and may be assigned multiple ten-digit NANP numbers for those services. As a result, the number of “users” or “registered users” is greater than the number of unique individuals who register for VRS and IP Relay services. Because these information collections are applied to each registration for and each ten-digit number assigned, the terms “user” and “registered user,” as defined herein, more accurately reflects the burdens and costs associated with these information collections.

**Structure and Practices of the Video Relay Service Program; Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities, CG Docket Nos. 10-51 & 03-123**

comparable to mid-to-senior-level federal employees (GS-15/5), at a rate of \$77.49 per hour, to perform legal tasks.

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

**(a) System Maintenance for Routing Information for VRS and IP Relay**

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

**ANNUAL NUMBER OF RESPONDENTS: 6**

6 VRS and IP Relay providers<sup>126</sup>

**ANNUAL NUMBER OF RESPONSES: 6**

6 respondents x 1 response / respondent = 6

**ANNUAL BURDEN HOURS: 1,500 hours**

The Commission estimates that each respondent will require an average of 250 hours each year to maintain the systems that automatically obtain, retain and provision routing information from registered users.

6 responses x 250 hours / response = 1,500 hours

**ANNUAL IN-HOUSE COST: \$83,625**

The Commission estimates that the providers will use in-house personnel at a rate equivalent to that of a senior-level federal employee (GS 13/5 at \$55.75 per hour).  
1,500 hours x \$55.75 / hour = \$83,625

**(b) New VRS and IP Relay Users Configuring Their Devices**

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

**ANNUAL NUMBER OF RESPONDENTS: 17,000**

The Commission estimates that approximately 10,000 new VRS users, 1,000 new hearing point-to-point video users, 5,000 new enterprise and public videophone responsible individuals,<sup>127</sup> and 1,000 new IP Relay users<sup>128</sup> will register each year.

10,000 + 1,000 + 5,000 + 1,000 = 17,000 respondents

**ANNUAL NUMBER OF RESPONSES: 17,000**

17,000 respondents x 1 response / respondent = 17,000

<sup>126</sup> The 5 VRS providers are the same 5 VRS providers identified in subsection (A) and are also a subset of the 15 TRS providers identified in subsection (N). The 1 IP Relay provider is a subset of the 15 TRS providers identified in subsection (N).

<sup>127</sup> These are the same new VRS users and new hearing point-to-point video users identified in subsections (D) and (E) and the same new enterprise and public videophone responsible individuals identified in subsection (E).

<sup>128</sup> These 1,000 new IP Relay users are not identified above.

**Structure and Practices of the Video Relay Service Program; Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities, CG Docket Nos. 10-51 & 03-123****ANNUAL BURDEN HOURS: 5,100 hours**

The Commission estimates that the new users will spend an average of 0.30 hour (18 minutes) to configure or attempt to configure their devices.

$$17,000 \text{ responses} \times 0.30 \text{ hour / response} = 5,100 \text{ hours}$$

**ANNUAL IN-HOUSE COST: \$0**

Because these burdens are on the users, not the providers, the hourly cost is \$0, and the total cost is \$0.

**(c) Providers assisting the VRS and IP Relay Users**

VRS and IP Relay providers will need to assist the registered users to configure their devices.

**ANNUAL NUMBER OF RESPONDENTS: 6**

6 VRS and IP Relay providers<sup>129</sup>

**ANNUAL NUMBER OF RESPONSES: 17,000**

The Commission estimates that the respondents will need to assist each of the 17,000 new users to configure their devices.

**ANNUAL BURDEN HOURS: 5,100 hours**

The Commission estimates that the providers will require 0.30 hour (18 minutes) to assist each user.

$$17,000 \text{ responses} \times 0.30 \text{ hour} = 5,100 \text{ hours}$$

**ANNUAL IN-HOUSE COST: \$134,793**

The Commission estimates that the respondents will use in-hour personnel at a rate comparable to that of an administrative federal employee (GS-7/5 at \$39.65 per hour).  
5,100 hours x \$26.43 / hour = \$134,793

**(d) Maintaining Systems for Checking Geographically Appropriate NANP Telephone Numbers**

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

**ANNUAL NUMBER OF RESPONDENTS: 6**

6 VRS and IP Relay providers<sup>130</sup>

**ANNUAL NUMBER OF RESPONSES: 6**

$$6 \text{ respondents} \times 1 \text{ response / respondent} = 6$$

---

<sup>129</sup> The 5 VRS providers are the same 5 VRS providers identified in subsection (A) and are also a subset of the 15 TRS providers identified in subsection (N). The 1 IP Relay provider is a subset of the 15 TRS providers identified in subsection (N).

<sup>130</sup> The 5 VRS providers are the same 5 VRS providers identified in subsection (A) and are also a subset of the 15 TRS providers identified in subsection (N). The 1 IP Relay provider is a subset of the 15 TRS providers identified in subsection (N).

**ANNUAL BURDEN HOURS: 300 hours**

The Commission estimates that each respondent will spend an average of 50 hours per year maintaining systems to ensure that the toll-free number of a user that is associated with a geographically appropriate NANP number will be associated with the same URI as that geographically appropriate NANP telephone number.

6 responses x 50 hours / response = 300 hours

**ANNUAL IN-HOUSE COST: \$16,725**

The Commission estimates that the respondents will use in-house personnel at a rate equivalent to that of a Grade 13 Level 5 federal employee (\$55.75 per hour).

300 hours x \$55.75 / hour = \$16,725

**(2) Routing Information for Qualified DVC Entities**

In the *2019 VRS Program Management Order*, the Commission adopted rules that would allow Qualified DVC Entities to have access to the TRS Numbering Directory. A key piece of that access is for each Qualified DVC Entity to obtain the routing information for each device served by the Qualified DVC Entity. Because the Qualified DVC Entities will be new, they will need to develop, test and deploy computer systems to provide information to the TRS Numbering Directory and TRS-URD.

**(a) Developing Systems to Obtain Routing Information**

Each Qualified DVC Entity will need to develop, test and deploy a computer system for recording routing information for each device served by the Qualified DVC Entity. The system will be developed once – when the Qualified DVC Entity begins to provide service.

**ANNUAL NUMBER OF RESPONDENTS: 2**

The Commission estimates that there will be 2 new Qualified DVC Entities each year<sup>131</sup>

**ANNUAL NUMBER OF RESPONSES: 2**

2 respondents x 1 response = 2 responses

**ANNUAL BURDEN HOURS: 80 hours**

The Commission estimates that each Qualified DVC Entity will require 40 hours to develop a database.

2 responses x 40 hours / response = 80 hours

**ANNUAL IN-HOUSE COST: \$4,460**

The Commission estimates that a Qualified DVC Entity would use in-house personnel whose pay is comparable to senior level federal employees (GS-13/5 at \$55.75/hour).

80 hours x \$55.75 / hour = \$4,460

**(b) Database Maintenance for Routing Information**

The Commission expects that in the years after the database is developed and implemented, each Qualified DVC Entity will need to maintain the database. Although respondents will incur the burdens estimated in this section each year after the year when the database is developed, for purposes of cumulative burden estimates, these estimates

---

<sup>131</sup> These 2 Qualified DVC Entities are a subset of the 6 Qualified DVC Entities identified in subsection (T).

are annualized over the three-year period for which the Commission seeks approval for this collection.

**ANNUALIZED NUMBER OF RESPONDENTS: 2**

With 2 new Qualified DVC Entities each year, in Year 1, there would be no database maintenance. In Year 2, the 2 original Qualified DVC Entities would maintain their databases. In Year 3, the 2 original Qualified DVC Entities plus the 3 Qualified DVC Entities who initiated service in Year 2 will need to maintain their databases in Year 3. Thus, the number of respondents needing to maintain existing databases in Years 1, 2 and 3 are:

$0 + 2 + 4 = 6$  total respondents for three years

$6$  respondents / 3 years = 2 annualized respondents<sup>132</sup>

**ANNUALIZED NUMBER OF RESPONSES: 2**

$2$  respondents x 1 response = 2

**ANNUALIZED BURDEN HOURS: 20**

The Commission estimates that each provider will spend an average of 10 hours per year maintaining the databases.

$2$  responses x 10 hours = 20 hours

**ANNUALIZED IN-HOUSE COST: \$1,115**

The Commission estimates that the Qualified DVC Entities will use in-house personnel whose pay is comparable to senior level federal employees (GS-13/5 at \$55.75/hour).

$20$  hours x \$55.75 / hour = \$1,115

(c) Qualified DVC Entities Configuring New Devices

When the Qualified DVC Entities register new devices, they need to notify the default providers.

**ANNUAL NUMBER OF RESPONDENTS: 6**

The Commission estimates that there will be 6 Qualified DVC Entities<sup>133</sup>

**ANNUAL NUMBER OF RESPONSES: 200**

The Commission assumes that there will be on average approximately 200 new devices per year.

**ANNUAL BURDEN HOURS: 60 hours**

The Commission estimates that the Qualified DVC Entities will spend an average of 0.30 hour (18 minutes) to configure their devices.

$200$  responses x 0.30 hour / response = 60 hours

**ANNUAL IN-HOUSE COST: \$1,585.80**

The Commission assumes that each provider will use in-house personnel whose pay is comparable to administrative level federal employees (GS-7/5), at a rate of \$26.43 per hour, to configure the new devices.

$60$  hours x \$26.43 / hour = \$1,585.80

---

<sup>132</sup> These 2 annualized Qualified DVC Entities are a subset of the 6 Qualified DVC Entities identified in subsection (T).

<sup>133</sup> These are the same 6 Qualified DVC Entities identified in subsection (T).

**(d) Qualified DVC Entities Creating System for Checking the NANP Number with the URI**

Each Qualified DVC Entity will need to develop, test, and deploy a computer system for checking that each toll-free number associated with a geographic NANP telephone number is associated with the correct URI. The system will be developed once – when the Qualified DVC Entity begins to provide service.

**ANNUAL NUMBER OF RESPONDENTS: 2**

The Commission estimates that there will be 2 new Qualified DVC Entities each year.<sup>134</sup>

**ANNUAL NUMBER OF RESPONSES: 2**

2 respondents x 1 response / respondent = 2

**ANNUAL BURDEN HOURS: 80 hours**

The Commission estimates that each Qualified DVC Entity will require 40 hours to develop a database.

2 responses x 40 hours / response = 80 hours

**ANNUAL IN-HOUSE COST: \$4,460**

The Commission estimates that a Qualified DVC Entity would use in-house personnel whose pay is comparable to senior level federal employees (GS-13/5 at \$55.75/hour).  
80 hours x \$55.75 / hour = \$4,460

**(e) Maintaining Systems for Checking Geographic NANP Telephone Numbers**

As discussed above, each Qualified DVC Entity must also ensure that each toll-free number associated with a geographic NANP number is associated with the correct URI. After the system is developed in the first year of operation, the Qualified DVC Entity will need to maintain these systems. Because the yearly burdens increase starting with \$0 in Year 1, these estimates are annualized over the three-year period for which the Commission seeks approval for this collection.

**ANNUALIZED NUMBER OF RESPONDENTS: 2**

The Commission estimates that there will be 2 new Qualified DVC Entities each year. This means that in Year 1, there will be no Qualified DVC Entities that need to maintain a system; in Year 2, there will be 2 entities that need to maintain their systems, and in Year 3, there will be 4 entities that need to maintain their systems ( $0 + 2 + 4 = 6$  respondents total for three years)

6 respondents / 3 years = 2 annualized respondents<sup>135</sup>

**ANNUALIZED NUMBER OF RESPONSES: 2**

2 respondents x 1 response = 2

**ANNUALIZED BURDEN HOURS: 100 hours**

The Commission estimates that each respondent will spend an average of 50 hours per year maintaining systems to ensure that each toll-free number is associated with a geographic NANP number, which, in turn, is associated with the correct URI.

50 hours x 2 responses = 100 hours

---

<sup>134</sup> These 2 Qualified DVC Entities are a subset of the 6 Qualified DVC Entities identified in subsection (T).

<sup>135</sup> These 2 annualized Qualified DVC Entities are a subset of the 6 Qualified DVC Entities identified in subsection (T).

**ANNUALIZED IN-HOUSE COST: \$5,575**

The Commission estimates that the respondents will use in-house personnel at a rate equivalent to that of a grade 13 – level 5 federal employee (\$55.75 per hour).  
 $100 \text{ hours} \times \$55.75 / \text{hour} = \$5,575$

**CUMULATIVE TOTALS (for AF)**

**TOTAL NUMBER OF RESPONDENTS: 17,012**

(6 VRS and IP Relay provider<sup>136</sup> + 6 Qualified DVC Entities<sup>137</sup> + 17,000 new users)<sup>138</sup> = 17,012 respondents

**TOTAL NUMBER OF RESPONSES: 34,220**

$6 + 17,000 + 17,000 + 6 + 2 + 2 + 200 + 2 + 2 = 34,220$

**TOTAL BURDEN HOURS: 12,340**

$1,500 + 5,100 + 5,100 + 300 + 80 + 20 + 60 + 80 + 100 = 12,340$

**TOTAL IN-HOUSE COST: \$252,338.80** (\$83,625 + 0.00 + \$134,793 + \$16,725 + \$4,460 + \$1,115 + \$1,585.80 + \$4,460 + \$5,575) = \$252,338.80

**(AG) Registered Location.**

VRS and IP Relay providers must obtain and retain a Registered Location for each newly registered user. The Commission expects that approximately 95% of new users will complete this process online, and approximately 5% of new users will complete the process offline, *e.g.*, by contacting a service representative. The Commission assumes that all current VRS and IP Relay providers have: (1) deployed websites to collect registration information, Registered Location information, and user notification affirmative acknowledgments,<sup>139</sup> and (2) developed a separate tracking system for offline registration. Because these requirements have been in place for many years, there are no current burdens or costs to providers associated with the development, testing, and deployment of these systems. The Commission expects, however, that providers will need to maintain these systems. The Commission also expects that a registered user may, on occasion, need to update his or her Registered Location, and that doing so will require less time because of his or her familiarity with the process.

**(1) System Maintenance**

**ANNUAL NUMBER OF RESPONDENTS: 6**

6 providers of VRS and IP Relay<sup>140</sup>

**ANNUAL NUMBER OF RESPONSES: 6**

---

<sup>136</sup> The 5 VRS providers are the same 5 VRS providers identified in subsection (A) and are also a subset of the 15 TRS providers identified in subsection (N). The 1 IP Relay provider is a subset of the 15 TRS providers identified in subsection (N).

<sup>137</sup> These are the same 6 Qualified DVC Entities identified in subsection (T).

<sup>138</sup> 16,000 of these 17,000 new users are already identified in subsections (D) and (E).

<sup>139</sup> See subsections (AJ) and (AK), *infra*.

<sup>140</sup> The 5 VRS providers are the same 5 VRS providers identified in subsection (A) and are also a subset of the 15 TRS providers identified in subsection (N). The 1 IP Relay provider is a subset of the 15 TRS providers identified in subsection (N).

**Structure and Practices of the Video Relay Service Program; Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities, CG Docket Nos. 10-51 & 03-123**

6 respondents x 1 response / respondent = 6

**ANNUAL BURDEN HOURS: 1,500 hours**

The Commission estimates that each of the 6 providers will spend an average of 250 hours per year maintaining systems associated with online registration services.

6 respondents x 250 hours / respondent = 1,500 hours

**ANNUAL COST: \$83,625**

The Commission estimates that the 6 providers will use in-house personnel whose pay is comparable to senior-level federal employees (GS-13/5 at \$55.75 per hour).<sup>141</sup>

1,500 hours x \$55.75 / hour = \$83,625

**(2) User Registration – Burden on Users**

**ANNUAL NUMBER OF RESPONDENTS: 17,000**

The Commission estimates that approximately 10,000 new VRS users, 1,000 new hearing point-to-point video users, 5,000 new enterprise and public videophone responsible individuals,<sup>142</sup> and 1,000 new IP Relay<sup>143</sup> users will register each year.

10,000 + 1,000 + 5,000 + 1,000 = 17,000 respondents

**ANNUAL NUMBER OF RESPONSES: 17,000**

17,000 new users x 1 response per user = 17,000

**ANNUAL BURDEN HOURS: 8,500 hours**

The Commission estimates that each new user will spend an average of .50 hour (30-minutes) to provide registration information, Registered Location information, and user notification affirmative acknowledgments online.

17,000 users x 0.50 hour / user = 8,500 hours

**ANNUAL COST: \$0**

Because these burdens are on the users, not the providers, the hourly cost is \$0.

8,500 hours x \$0 / hour = \$0

**(3) User Registration – Assistance from the Provider**

**ANNUAL NUMBER OF RESPONDENTS: 6**

6 providers of VRS and IP Relay<sup>144</sup>

**ANNUAL NUMBER OF RESPONSES: 17,000**

The Commission estimates that the providers will assist the estimated 17,000 new users registering for service.

17,000 new users x 1 response per user = 17,000

**ANNUAL BURDEN HOURS: 4,250 hours**

<sup>141</sup> The Commission assumes that there is no additional burden or cost to providers related to users registering through the provider's online registration system.

<sup>142</sup> These are the same new VRS users and new hearing point-to-point video users identified in subsections (D) and (E) and the same new enterprise and public videophone responsible individuals identified in subsection (E).

<sup>143</sup> These 1,000 new IP Relay users are the same new IP Relay users identified in subsection (AF)(1)(b).

<sup>144</sup> The 5 VRS providers are the same 5 VRS providers identified in subsection (A) and are also a subset of the 15 TRS providers identified in subsection (N). The 1 IP Relay provider is a subset of the 15 TRS providers identified in subsection (N).

**Structure and Practices of the Video Relay Service Program; Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities, CG Docket Nos. 10-51 & 03-123**

The Commission estimates that the providers will spend an average of 0.25 hour (15 minutes) with each of these users to assist them with their registration.

$$17,000 \times 0.25 \text{ hour} = 4,250 \text{ hours}$$

**ANNUAL COST: \$112,327.50**

The Commission estimates that the 6 providers will use in-house personnel whose pay is comparable to federal employees (GS-7/5 at \$26.43 per hour).

$$4,250 \text{ hours} \times \$26.43 / \text{hour} = \$112,327.50$$

**(4) Updates to Registered Location**

**ANNUAL NUMBER OF RESPONDENTS: 17,000**

The Commission estimates that approximately 10,000 existing VRS users, 1,000 existing hearing point-to-point video users, 5,000 existing enterprise and public videophone responsible individuals, and 1,000 existing IP Relay users will update their Registered Location each year.

$$10,000 + 1,000 + 5,000 + 1,000 = 17,000 \text{ respondents}^{145}$$

**ANNUAL NUMBER OF RESPONSES: 17,000**

$$17,000 \text{ respondents} \times 1 \text{ response / respondent} = 17,000 \text{ responses}$$

**ANNUAL BURDEN HOURS: 4,250 hours**

The Commission estimates that the users who update their Registered Location will each spend 0.25 hour (15 minutes) doing so.

$$17,000 \text{ users} \times 0.25 \text{ hour} = 4,250 \text{ hours}$$

**ANNUAL COST: \$0**

Because these burdens are on the users, not the providers, the hourly cost is \$0.

$$4,250 \text{ hours} \times \$0 / \text{hour} = \$0$$

**(5) Registered Location Updates – Assistance from the Provider**

**ANNUAL NUMBER OF RESPONDENTS: 6**

$$6 \text{ providers of VRS and IP Relay}^{146}$$

**ANNUAL NUMBER OF RESPONSES: 17,000**

The Commission estimates that the 17,000 users who will update their Registered Location each year will require assistance from the provider.

**ANNUAL BURDEN HOURS: 4,250 hours**

The Commission estimates that the providers will spend an average of 0.25 hour (15 minutes) with each of the users who provide their updated Registered Location.

$$17,000 \text{ responses} \times 0.25 \text{ hour / response} = 4,250 \text{ hours}$$

**ANNUAL COST: \$112,327.50**

The Commission estimates that the providers will use in-house personnel whose pay is comparable to federal employees (GS-7/5 at \$26.43 per hour).

$$4,250 \text{ hours} \times \$26.43 / \text{hour} = \$112,327.50$$

<sup>145</sup> These 17,000 existing users are different from the new users identified in subsection (AF)(1)(b).

<sup>146</sup> The 5 VRS providers are the same 5 VRS providers identified in subsection (A) and are also a subset of the 15 TRS providers identified in subsection (N). The 1 IP Relay provider is a subset of the 15 TRS providers identified in subsection (N).

**CUMULATIVE TOTALS FOR (AG):**

**TOTAL ANNUAL NUMBER OF RESPONDENTS: 34,006** (6 VRS and IP Relay providers<sup>147</sup> + 10,000 new VRS users, 1,000 new hearing point-to-point video users, and 5,000 new enterprise and public videophone responsible individuals<sup>148</sup> + 1,000 new IP Relay users<sup>149</sup> + 17,000 existing users updating information<sup>150</sup>)

**TOTAL ANNUAL NUMBER OF RESPONSES: 68,006** (6 + 17,000 + 17,000 + 17,000 + 17,000) = 68,006

**TOTAL ANNUAL BURDEN HOURS: 22,750** (1,500 + 8,500 + 4,250 + 4,250 + 4,250) = 22,750

**TOTAL ANNUAL IN-HOUSE COSTS: \$308,280** (\$83,625 + \$0.00 + \$112,327.50 + \$0.00 + \$112,327.50) = \$308,280

**(AH) Provision of Registered Location.**

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

**ANNUAL NUMBER OF RESPONDENTS: 6**  
6 VRS and IP Relay providers<sup>151</sup>

**ANNUAL NUMBER OF RESPONSES: 6**  
1 response / respondent x 6 respondents = 6

**ANNUAL BURDEN HOURS: 1,500 hours**  
The Commission estimates that each of the 6 providers will spend an average of 250 hours per year maintaining automated systems for provisioning ALI databases.  
6 respondents x 250 hours = 1,500 hours

**ANNUAL IN-HOUSE COSTS: \$83,625**  
The Commission estimates that each of the 6 providers will use in-house personnel at a rate of \$55.75 per hour.  
1,500 hours x \$55.75 / hour = \$83,625

---

<sup>147</sup> The 5 VRS providers are the same 5 VRS providers identified in subsection (A) and are also a subset of the 15 TRS providers identified in subsection (N). The 1 IP Relay provider is a subset of the 15 TRS providers identified in subsection (N).

<sup>148</sup> These are the same new VRS users, new hearing point-to-point video users, and new enterprise and public videophone responsible individuals identified in subsections (D) and (E).

<sup>149</sup> These new IP Relay users are the same new users identified in subsection (AF)(1)(b).

<sup>150</sup> These 17,000 existing users updating information are first identified here in subsection (AG)(4).

<sup>151</sup> The 5 VRS providers are the same 5 VRS providers identified in subsection (A) and are also a subset of the 15 TRS providers identified in subsection (N). The 1 IP Relay provider is a subset of the 15 TRS providers identified in subsection (N).

**(AI) Dispatchable Location.**

Beginning on January 6, 2021, providers of fixed VRS, IP Relay, and covered IP CTS services must provide automated dispatchable location with all 911 calls to an appropriate PSAP, designated statewide default answering point, or appropriate local emergency authority that corresponds to the caller's location. Beginning on January 6, 2022, providers of non-fixed VRS, IP Relay, and covered IP CTS services must provide automated dispatchable location with all 911 calls to an appropriate PSAP, designated statewide default answering point, or appropriate local emergency authority that corresponds to the caller's location if it is technically feasible to do so. Otherwise, they must provide either Registered Location or alternative location information to an appropriate PSAP, designated statewide default answering point, or appropriate local emergency authority.

For the purpose of this supporting statement, the Commission assumes that all respondents will provide automated dispatchable location, which we assume to have the highest one-time burdens and costs of all location options. The Commission assumes that the respondents will need to modify their location information systems to support this automated dispatchable location capability. The Commission estimates that it will take approximately 40 hours for each provider to successfully implement this capability for fixed services in year 1 and approximately 300 hours for each provider to successfully implement this capability for non-fixed services in year 2. The burdens associated with maintaining these capabilities are already covered under section (AG) Registered Location (1) System Maintenance.

**(1) Fixed Services**

**ANNUALIZED NUMBER OF RESPONDENTS: 5**

- 5 respondents provide VRS<sup>152</sup>
- 4 respondents provide covered IP CTS<sup>153</sup>
- 1 respondent provides IP Relay and covered IP CTS<sup>154</sup>
- The Commission estimates that there may be up to 5 respondents filing applications to provide TRS as new market entrants, of which 3 respondents have already filed applications to provide IP CTS.<sup>155</sup>

$$(5 + 4 + 1 + 5) / 3 = 5$$

**ANNUALIZED NUMBER OF RESPONSES: 5 (rounded)**

$[(1 \text{ response} / \text{respondent} \times 14 \text{ respondents}) + (2 \text{ responses} / \text{respondent} \times 1 \text{ respondent}^{156})] / 3 = 5$   
(rounded)

**ANNUALIZED BURDEN HOURS: 213 hours (rounded)**

<sup>152</sup> The 5 VRS providers are the same 5 VRS providers identified in subsection (A) and are also a subset of the 15 TRS providers identified in subsection (N).

<sup>153</sup> These 4 covered IP CTS providers are a subset of the 15 TRS providers identified in subsection (N). One of these respondents that provides IP CTS is a wholly-owned subsidiary of a respondent that provides VRS.

<sup>154</sup> This provider is a subset of the 15 TRS providers identified in subsection (N).

<sup>155</sup> These 5 respondents are a subset of the 15 TRS providers identified in subsection (N).

<sup>156</sup> The 1 respondent that provides both IP CTS and IP Relay will provide 2 responses.

The Commission estimates that each of the 15 providers will spend 40 hours modifying its location information system in year 1.

$(16 \text{ responses} \times 40 \text{ hours}) / 3 = 213 \text{ hours (rounded)}$

**ANNUALIZED IN-HOUSE COSTS: \$11,893.15**

The Commission estimates that each of the 15 providers will use in-house personnel whose pay is comparable to federal employees (GS-13/5 at \$55.75 per hour).

$213 \text{ hours} \times \$55.75 / \text{hour} = \$11,874.75$

**(1) Non-Fixed Services**

**ANNUALIZED NUMBER OF RESPONDENTS: 5**

- 5 respondents provide VRS<sup>157</sup>
- 4 respondents provide covered IP CTS<sup>158</sup>
- 1 respondent provides IP Relay and covered IP CTS<sup>159</sup>
- The Commission estimates that there may be up to 5 respondents filing applications to provide TRS as new market entrants, of which 3 respondents have already filed applications to provide IP CTS.<sup>160</sup>

$(5 + 4 + 1 + 5) / 3 = 5$

**ANNUALIZED NUMBER OF RESPONSES: 5 (rounded)**

$[(1 \text{ response} / \text{respondent} \times 14 \text{ respondents}) + (2 \text{ responses} / \text{respondent} \times 1 \text{ respondent}^{161})] / 3 = 5$   
(rounded)

**ANNUALIZED BURDEN HOURS: 1,600 hours**

The Commission estimates that each of the 15 providers will spend 300 hours modifying its location information system in year 1.

$(16 \text{ responses} \times 300 \text{ hours}) / 3 = 1,600 \text{ hours}$

**ANNUALIZED IN-HOUSE COSTS: \$89,200.00**

The Commission estimates that each of the 15 providers will use in-house personnel whose pay is comparable to federal employees (GS-13/5 at \$55.75 per hour).

$1,600 \text{ hours} \times \$55.75 / \text{hour} = \$89,200.00$

**CUMULATIVE TOTALS FOR (AI):**

**TOTAL ANNUALIZED NUMBER OF RESPONDENTS: 5<sup>162</sup>**

<sup>157</sup> The 5 VRS providers are the same 5 VRS providers identified in subsection (A) and are also a subset of the 15 TRS providers identified in subsection (N).

<sup>158</sup> These 4 covered IP CTS providers are a subset of the 15 TRS providers identified in subsection (N). One of these respondents that provides IP CTS is a wholly-owned subsidiary of a respondent that provides VRS.

<sup>159</sup> This provider is a subset of the 15 TRS providers identified in subsection (N).

<sup>160</sup> These 5 respondents are a subset of the 15 TRS providers identified in subsection (N).

<sup>161</sup> The 1 respondent that provides both IP CTS and IP Relay will provide 2 responses.

<sup>162</sup> These are the same 15 TRS providers (annualized) identified in subsection (N).

**TOTAL ANNUALIZED NUMBER OF RESPONSES: 10**  
 $(5 + 5) = 10$

**TOTAL ANNUALIZED BURDEN HOURS: 1,813**  
 $(213 + 1,600) = 1,813$

**TOTAL ANNUALIZED IN-HOUSE COSTS: \$101,074.75**  
 $(\$11,874.75 + \$89,200.00) = \$101,074.75$

**(AJ) User Notification for VRS and IP Relay.**

Every VRS or IP Relay provider must include an advisory on its website regarding numbering, E911, toll-free numbers, and related issues, and include the advisory in any promotional materials addressing numbering and E911 services for VRS or IP Relay. Because these requirements have been in place for several years, the Commission assumes that all current VRS and IP Relay providers have complied with this user notification requirement and that there are no current burdens or costs to providers associated with the initial implementation of this requirement.<sup>163</sup> However, the Commission assumes that the VRS and IP Relay providers will need to occasionally update the E911 website postings.

**ANNUALIZED NUMBER OF RESPONDENTS: 2**

6 VRS and IP Rely providers annualized over the 3-year period for this Supporting Statement  
 $6 \text{ providers} / 3 \text{ years} = 2 \text{ providers}^{164}$

**ANNUALIZED NUMBER OF RESPONSES: 2**

1 response per respondent during the 3-year period = 2 annualized respondents x 1 response = 2 responses

**ANNUALIZED BURDEN HOURS: 4**

The Commission estimates each respondent will require approximately 2 hours to revise each notification on an accessible website.

$2 \text{ hours} / \text{response} \times 2 \text{ responses} = 4 \text{ hours}$

**ANNUALIZED IN-HOUSE COSTS: \$309.96**

The Commission assumes that respondents will use in-house personnel whose pay is comparable to senior level federal employees (GS-15/5 at \$77.49/hour) to provide revised E911 information on an accessible website.

$4 \text{ hours} \times \$77.49/\text{hour} = \$309.96$

**(AK) Affirmative Acknowledgments for VRS and IP Relay.**

VRS and IP Relay providers must obtain and retain a record of affirmative acknowledgment from each of their registered users of having received and understood the user notification. The Commission assumes that current VRS and IP Relay providers have obtained an affirmative acknowledgment from their registered users, and that all providers will obtain such

---

<sup>163</sup> To the extent that providers incorporate the required advisory into their promotional materials, there should be no annual burden or in-house costs to the respondents.

<sup>164</sup> The 2 annualized respondents are a subset of the 5 VRS providers identified in subsection (A).

**Structure and Practices of the Video Relay Service Program; Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities, CG Docket Nos. 10-51 & 03-123**

acknowledgments from their new users.<sup>165</sup> The Commission expects that providers will retain all users' affirmative acknowledgments electronically.

**(1) Users Reading and Acknowledging the Notification**

**ANNUAL NUMBER OF RESPONDENTS: 17,000**

The Commission estimates that approximately 10,000 new VRS users, 1,000 new hearing point-to-point video users, 5,000 new enterprise and public videophone responsible individuals,<sup>166</sup> and 1,000 new IP Relay users<sup>167</sup> will register each year, and will read and acknowledge receipt and understanding of the user notification online.

$$10,000 + 1,000 + 5,000 + 1,000 = 17,000 \text{ respondents}$$

**ANNUAL NUMBER OF RESPONSES: 17,000**

$$17,000 \text{ users} \times 1 \text{ response / user} = 17,000 \text{ responses}$$

**ANNUAL BURDEN HOURS: 4,250 hours**

The Commission estimates that these responses will take an average of 0.25 hour (15 minutes) for the user to read and acknowledge receipt and understanding of the user notification online.

$$17,000 \text{ users} \times 0.25 \text{ hour / user} = 4,250 \text{ hours}$$

**ANNUAL IN-HOUSE COSTS: \$0**

Because these burdens are on the users, not the providers, the hourly cost is \$0.

$$4,250 \text{ hours} \times \$0 / \text{hour} = \$0$$

**(2) Providers Assisting Users**

**ANNUAL NUMBER OF RESPONDENTS: 6**

The Commission estimates that the 6 VRS and IP Relay providers<sup>168</sup> will provide assistance to 17,000 new users.

**ANNUAL NUMBER OF RESPONSES: 17,000**

$$17,000 \text{ new users} \times 1 \text{ provider response / user} = 17,000 \text{ responses}$$

**ANNUAL BURDEN HOURS: 1,700**

The Commission estimates that the providers will spend an average of 0.10 hour (6 minutes) each with the new users.

$$17,000 \text{ users} \times 0.10 \text{ hour} = 1,700 \text{ hours}$$

**ANNUAL IN-HOUSE COSTS: \$44,931**

The Commission estimates that the providers will use in-house personnel at a rate of a federal employee at GS-7/5 (\$26.43 per hour).

$$1,700 \text{ hours} \times \$26.43 / \text{hour} = \$44,931$$

---

<sup>165</sup> The burdens and costs associated with maintaining a website to obtain user notification affirmative acknowledgments online, and a tracking system for offline registrations, are included in paragraph 12(NC), *supra*.

<sup>166</sup> These are the same new VRS users, new hearing point-to-point video users, and new enterprise and public videophone responsible individuals identified in subsections (D) and (E).

<sup>167</sup> These are the same new IP Relay users identified in subsection (AF)(1)(b).

<sup>168</sup> The 5 VRS providers are the same 5 VRS providers identified in subsection (A) and are also a subset of the 15 TRS providers identified in subsection (N). The 1 IP Relay provider is a subset of the 15 TRS providers identified in subsection (N).

**(3) Electronic Storage of Affirmative Acknowledgments**

**ANNUAL NUMBER OF RESPONDENTS: 6**

6 VRS and IP Relay providers<sup>169</sup>

**ANNUAL NUMBER OF RESPONSES: 6**

1 response / provider x 6 providers = 6 responses

**ANNUAL BURDEN HOURS: 72**

The Commission estimates that each of the 6 providers will spend an average of 12 hours per year overseeing electronic storage of affirmative acknowledgment for registered users.

6 providers x 12 hours / year = 72 hours

**ANNUAL IN-HOUSE COST: \$4,014**

The Commission estimates that the providers will use in-house personnel at a rate comparable to senior level federal employees (GS-13/5 at \$55.75) per hour.

72 hours x \$55.75 / hour = \$4,014

**CUMULATIVE TOTALS (for AK)**

**TOTAL NUMBER OF RESPONDENTS: 17,006 respondents** (17,000<sup>170</sup> + 6<sup>171</sup>)

**TOTAL ANNUAL NUMBER OF RESPONSES: 34,006 responses** (17,000 + 17,000 + 6)

**TOTAL ANNUAL BURDEN HOURS: 6,022 hours** (4,250 + 1,700 + 72)

**TOTAL ANNUAL IN-HOUSE COSTS: \$48,945** (\$0 + \$44,931 + \$4,014)

**(AL) *Ascertaining Registration Status of VRS or IP Relay User.***

When a dial-around call is placed with a VRS or IP Relay provider, the provider must verify that the caller is registered with another provider to ensure that all eligible consumers using VRS or IP Relay are registered with a default provider.<sup>172</sup> The provider may do so by requesting the caller's ten-digit NANP number and querying the TRS Numbering Directory using that number.

**ANNUAL NUMBER OF RESPONDENTS: 5**

---

<sup>169</sup> The 5 VRS providers are the same 5 VRS providers identified in subsection (A) and are also a subset of the 15 TRS providers identified in subsection (N). The 1 IP Relay provider is a subset of the 15 TRS providers identified in subsection (N).

<sup>170</sup> These are the same new VRS users, new hearing point-to-point video users, and new enterprise and public videophone responsible individuals identified in subsections (D) and (E) and the same new IP Relay users identified in subsection (AF)(1)(b).

<sup>171</sup> The 5 VRS providers are the same 5 VRS providers identified in subsection (A) and are also a subset of the 15 TRS providers identified in subsection (N). The 1 IP Relay provider is a subset of the 15 TRS providers identified in subsection (N).

<sup>172</sup> Because there is only one IP Relay provider certified by the Commission, this requirement does not apply to IP Relay at this time and for the foreseeable future.

**Structure and Practices of the Video Relay Service Program; Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities, CG Docket Nos. 10-51 & 03-123**

5 VRS providers<sup>173</sup> each need to maintain the querying function in their network equipment

**ANNUAL NUMBER OF RESPONSES: 5**

5 VRS providers x 1 response / provider = 5 responses

**ANNUAL BURDEN HOURS: 125 hours**

The Commission estimates that each VRS provider will spend 25 hours per year maintaining the querying function on its network.

5 VRS providers x 25 hours / per response = 125 hours

**ANNUAL IN-HOUSE COSTS: \$3,303.75**

The Commission estimates that the 5 providers will use in-house personnel at a rate comparable to mid-level federal employees (GS-7/5 at \$26.43) per hour.

125 hours x \$26.43 / hour = \$3,303.75

**(AM) *Information Sharing After a Change in Default Providers.***

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

**(1) Providers Updating Software****ANNUAL NUMBER OF RESPONDENTS: 5**

5 VRS providers<sup>174</sup>

**ANNUAL NUMBER OF RESPONSES: 5**

1 response / respondent x 5 respondents = 5 responses

**ANNUAL BURDEN HOURS: 125**

The Commission estimates that the 5 VRS providers will spend an average of 25 hours each per year to update software for new equipment to share information with new default providers.

5 respondent x 25 hours / respondent = 125 hours

**ANNUAL IN-HOUSE COSTS: \$6,968.75**

The Commission estimates that the respondents will use in-house personnel at a rate comparable to senior level federal employees (GS-13/5 at \$55.75) per hour.

---

<sup>173</sup> The 5 VRS providers are the same 5 VRS providers identified in subsection (A).

<sup>174</sup> The 5 VRS providers are the same 5 VRS providers identified in subsection (A).

125 hours x \$55.75 / hour = \$6,968.75

**(2) Providers Exchanging Equipment Information**

**ANNUAL NUMBER OF RESPONDENTS: 5**

5 VRS providers<sup>175</sup>

**ANNUAL NUMBER OF RESPONSES: 16,000**

The Commission estimates that approximately 10,000 existing VRS users, 1,000 existing hearing point-to-point video users, and 5,000 existing enterprise and public videophone responsible individuals will change default providers each year.

10,000 + 1,000 + 5,000 = 16,000 responses

**ANNUAL BURDEN HOURS: 1,600 hours**

The Commission estimates that the VRS providers will spend an average of 0.1 hour (about 6 minutes) per user to exchange equipment information with the new provider, when the user changes default providers.

0.1 hour / user x 16,000 users = 1,600 hours

**ANNUAL IN-HOUSE COSTS: \$42,288**

The Commission estimates that the VRS providers will use in-house personnel at a rate comparable to mid- level federal employees (GS-7/5 at \$26.43) per hour.

1,600 hours x \$26.43 / hour = \$42,288

**CUMULATIVE TOTALS FOR (AM)**

**TOTAL NUMBER OF RESPONDENTS: 5<sup>176</sup>**

**TOTAL ANNUAL NUMBER OF RESPONSES: 16,005 responses (5 + 16,000)**

**TOTAL ANNUAL BURDEN HOURS: 1,725 hours (125 + 1,600)**

**TOTAL ANNUAL IN-HOUSE COSTS: \$49,256.75 (\$6,968.75 + \$42,288)**

	<b>Collection</b>	<b>Number of Respondents</b>	<b>Number of Responses</b>	<b>Burden Hours</b>	<b>In-House Costs</b>
A	Reporting unauthorized . . . VRS	<b>5</b>	<b>375</b>	<b>188</b>	<b>\$12,354.50</b>
B	VRS Provider Cert. – Annual Plan	<b>5<sup>177</sup></b>	<b>5</b>	<b>400</b>	<b>\$26,352</b>
C	VRS Provider Cert. - Response	<b>1<sup>178</sup></b>	<b>1</b>	<b>5</b>	<b>\$329.40</b>
D	TRS User Cert. of Eligibility	<b>11,005<sup>179</sup></b>	<b>22,000</b>	<b>8,250</b>	<b>\$181,170</b>

<sup>175</sup> The 5 VRS providers are the same 5 VRS providers identified in subsection (A).

<sup>176</sup> The 5 VRS providers are the same 5 VRS providers identified in subsection (A).

<sup>177</sup> These respondents are the same 5 VRS providers identified in subsection (A).

<sup>178</sup> This VRS provider is one of the 5 VRS providers identified in subsection (A).

<sup>179</sup> 5 of these respondents are the same 5 VRS providers identified in subsection (A).

**Structure and Practices of the Video Relay Service Program; Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities, CG Docket Nos. 10-51 & 03-123**

E	TRS User Registration	34,005 <sup>180</sup>	102,000	58,700	\$3,504,816
F	TRS-URD Per-Call Validation	2 <sup>181</sup>	2	500	\$32,940
G	Removal from the TRS-URD	5 <sup>182</sup>	8,000	800	\$52,704
H	Assignment User's Unique Identifier	5 <sup>183</sup>	34,000	1,900	\$111,996
I	Verification of TRS provider changes	5 <sup>184</sup>	5,000	2,500	\$164,700
J	Retention of change orders	5 <sup>185</sup>	5,000	500	\$32,940
K	Notice of transfer or sale	1 <sup>186</sup>	150,000	22,500	\$1,482,300
L	Proof of verification	5 <sup>187</sup>	120	30	\$1,976.40
M	Identify unauthorized TRS mins.	5 <sup>188</sup>	120	60	\$3,952.80
N	Access to CPNI	15 <sup>189</sup>	180	180	\$11,858.40
O	Approval for use of CPNI	150,015 <sup>190</sup>	900,000	90,000	\$2,964,600
P	Notice required for use of CPNI	15 <sup>191</sup>	450,000	90,000	\$5,929,200
Q	Safeguards for CPNI use	15 <sup>192</sup>	15	600	\$39,528
R	Safeguards for CPNI disclosure	15 <sup>193</sup>	15,000	3,000	\$197,640
S	Notifications of CPNI breaches	15 <sup>194</sup>	30	120	\$7,905.60

<sup>180</sup> 11,005 of the 34,005 respondents are already identified in subsection (D).

<sup>181</sup> These respondents are the same 5 VRS providers (annualized) identified in subsection (A).

<sup>182</sup> These respondents are the same 5 VRS providers identified in subsection (A).

<sup>183</sup> These respondents are the same 5 VRS providers identified in subsection (A).

<sup>184</sup> These respondents are the same 5 VRS providers identified in subsection (A).

<sup>185</sup> These respondents are the same 5 VRS providers identified in subsection (A).

<sup>186</sup> This provider is a subset of the 5 VRS providers identified in subsection (A).

<sup>187</sup> These respondents are the same 5 VRS providers identified in subsection (A).

<sup>188</sup> These respondents are the same 5 VRS providers identified in subsection (A).

<sup>189</sup> 5 of these 15 TRS providers are the same 5 VRS providers identified in subsection (A).

<sup>190</sup> 15 of these respondents are the same 15 TRS providers identified in subsection (N). 5 of the 15 TRS providers are the same 5 VRS providers identified in subsection (A).

<sup>191</sup> These respondents are the same 15 TRS providers identified in subsection (N). 5 of the 15 TRS providers are the same 5 VRS providers identified in subsection (A).

<sup>192</sup> These respondents are the same 15 TRS providers identified in subsection (N). 5 of the 15 TRS providers are the same 5 VRS providers identified in subsection (A).

<sup>193</sup> These respondents are the same 15 TRS providers identified in subsection (N). 5 of the 15 TRS providers are the same 5 VRS providers identified in subsection (A).

**Structure and Practices of the Video Relay Service Program; Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities, CG Docket Nos. 10-51 & 03-123**

T	CPNI Obligations of Qualified DVC Entities	6	6	180	\$11,858.40
U	At-Home VRS – call handling monitoring and oversight	5 <sup>195</sup>	1,550	1,325	\$87,291
V	At-Home VRS call handling monthly reports	5 <sup>196</sup>	60	30	\$1,976.40
W	State Relay Certification Applications	19 <sup>197</sup>	19	285	\$22,085
X	Internet-Based TRS Provider Certification	5 <sup>198</sup>	5	200	\$15,498
Y	Qualified DVC Entity Registration	2 <sup>199</sup>	2	20	\$1,549.80
Z	Notification of Service Cessation for iTRS Providers	1 <sup>200</sup>	1	5	\$387.45
AA	Qualified DVC Entities Cessation of Service	1 <sup>201</sup>	1	1	\$77.49
AB	Suspension or Revocation Proceeding	2 <sup>202</sup>	2	25	\$1,937.25
AC	Notification of Substantive Change	13 <sup>203</sup>	25	49	\$3,797.01
AD	Submission of Annual Report	15 <sup>204</sup>	22	490	\$37,970.10

<sup>194</sup> These respondents are the same 15 TRS providers identified in subsection (N). 5 of the 15 TRS providers are the same 5 VRS providers identified in subsection (A).

<sup>195</sup> These respondents are the same 5 VRS providers identified in subsection (A).

<sup>196</sup> These respondents are the same 5 VRS providers identified in subsection (A).

<sup>197</sup> These 19 respondents are the annualized 56 state and U.S. territory programs.

<sup>198</sup> These respondents are the same 15 TRS providers identified in subsection (N). 5 of the 15 TRS providers are the same 5 VRS providers identified in subsection (A).

<sup>199</sup> These 2 Qualified DVC Entities are a subset of the 6 Qualified DVC Entities identified in subsection (T).

<sup>200</sup> This provider is a subset of the 15 TRS providers identified in subsection (N).

<sup>201</sup> This provider is a subset of the 6 respondents in subsection (T).

<sup>202</sup> 1 respondent is a subset of the 6 Qualified DVC Entities identified in subsection (T), and 1 respondent is a subset of the annualized 56 state and U.S. territory programs identified in subsection (W).

<sup>203</sup> 6 respondents are a subset of the 56 state and U.S. territory programs identified in subsection (W), the 5 VRS providers and 1 IP Relay provider respondents are a subset of the 15 TRS providers identified in subsection (N), and 1 respondent is a subset of the 6 Qualified DVC Entities identified in subsection (T).

**Structure and Practices of the Video Relay Service Program; Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities, CG Docket Nos. 10-51 & 03-123**

	and Compliance Plan				
AE	Service Interruptions	15 <sup>205</sup>	610	460	\$35,631.90
AF	Routing Information	17,012 <sup>206</sup>	34,220	12,340	\$252,338.80
AG	Registered Location	34,006 <sup>207</sup>	68,006	22,750	\$308,280
AH	Provision of Registered Location	6 <sup>208</sup>	6	1,500	\$83,625
AI	Dispatchable Location	5 <sup>209</sup>	5	1,813	\$101,074.75
AJ	User Notification for VRS and IP Relay	2 <sup>210</sup>	2	4	\$309.96
AK	Affirmative Acknowledgments for VRS and IP Relay	17,006 <sup>211</sup>	34,006	6,022	\$48,945
AL	Ascertaining VRS and IP Relay Users Registration Status	5 <sup>212</sup>	5	125	\$3,303.75
AM	Information Sharing After a	5 <sup>213</sup>	16,005	1,725	\$49,256.75

<sup>204</sup> These respondents are the same 15 TRS providers identified in subsection (N). 5 of the 15 TRS providers are the same 5 VRS providers identified in subsection (A).

<sup>205</sup> These respondents are the same 15 TRS providers identified in subsection (N). 5 of the 15 TRS providers are the same 5 VRS providers identified in subsection (A).

<sup>206</sup> 16,000 of the respondents are the same new VRS users and new hearing point-to-point video users identified in subsections (D)-(E) and the same new enterprise and public videophone responsible individuals identified in subsection (E), 1,000 of the respondents are the same new IP Relay users first identified in subsection (AF), 6 of the respondents are the same 5 VRS providers and 1 IP Relay provider that are a subset of the 15 TRS providers identified in subsection (N), and 6 of the respondents is a subset of the 6 Qualified DVC Entities identified in subsection (T).

<sup>207</sup> 17,006 of the 34,006 respondents are the same new VRS users and new hearing point-to-point video users identified in subsections (D)-(E), the same new enterprise and public videophone responsible individuals identified in subsection (E), the same new IP Relay users identified in subsection (AF), and the same 5 VRS providers and 1 IP Relay provider that are a subset of the 15 TRS providers identified in subsection (N). The remaining 17,000 respondents are existing VRS, hearing point-to-point video, and IP Relay users and enterprise and public videophone responsible individuals who are updating information and are first identified in this subsection (AG)(4).

<sup>208</sup> These 6 respondents are the same 5 VRS providers and 1 IP Relay provider that are a subset of the 15 TRS providers identified in subsection (T).

<sup>209</sup> These respondents are the same 15 TRS providers identified in subsection (N). 5 of the 15 TRS providers are the same 5 VRS providers identified in subsection (A).

<sup>210</sup> These 2 respondents are annualized from the same 5 VRS providers and 1 IP Relay provider that are a subset of the 15 TRS providers identified in subsection (T).

<sup>211</sup> These respondents are the same new VRS users and new hearing point-to-point video users identified in subsections (D)-(E), the same new enterprise and public videophone responsible individuals identified in subsection (E), the same new IP Relay users identified in subsection (AF), and the same 5 VRS providers and 1 IP Relay provider that are a subset of the 15 TRS providers identified in subsection (N).

<sup>212</sup> These respondents are the same 5 VRS providers identified in subsection (A).

**Structure and Practices of the Video Relay Service Program; Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities, CG Docket Nos. 10-51 & 03-123**

	Change in Default Provider				
	<b>Totals</b>	<b>202,021<sup>214</sup></b>	<b>1,846,406</b>	<b>329,582</b>	<b>\$15,826,456.90</b>

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 provide automated dispatchable location.
  - (i) The Commission estimates that 14 VRS and IP CTS provider respondents (including new market entrants) will purchase software at up to \$150,000 each to implement automated dispatchable location. The Commission further estimates that such software will have a useful life of 10 years.  
 $14 \text{ respondents (VRS and IP CTS providers)} \times \$150,000 / 10 \text{ years} = \$210,000 / \text{year}$
  - (ii) The Commission estimates that the 1 IP CTS and IP Relay provider respondents will purchase 2 sets of software (1 for IP CTS and 1 for IP Relay at up to \$150,000 each to implement automated dispatchable location. The Commission further estimates that such software will have a useful life of 10 years.  
 $1 \text{ respondent (IP CTS and IP Relay provider)} \times 2 \text{ sets of software} \times \$150,000 / 10 \text{ years} = \$30,000 / \text{year}$
- (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.  
 $5 \text{ respondents (VRS providers)} \times \$2,600 / \text{year} = \$13,000 / \text{year}$
  - (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.  
 $5 \text{ respondents (VRS providers)} \times \$1,600 / \text{year} = \$8,000 / \text{year}$

(a) Total annualized capital/start-up cost: \$240,000

(b) Total annual costs (operation and maintenance): \$21,000

<sup>213</sup> These respondents are the same 5 VRS providers identified in subsection (A).

<sup>214</sup> 15 of these respondents are the 15 TRS providers identified in subsection (N), of which 5 of the 15 TRS providers are the same 5 VRS providers first identified in subsection (A). 6 of the respondents the 6 Qualified DVC Entities first identified in subsection (T). 34,000 of the respondents are the same new VRS users and new hearing point-to-point video users first identified in subsections (D)-(E), the same new and existing enterprise and public videophone responsible individuals first identified in subsection (E). 150,000 of the respondents are the 150,000 (annualized) TRS users providing or refusing to provide consent to their TRS providers to utilize their CPNI identified in subsection (O). 1,000 of the respondents are the 1,000 new IP Relay users first identified in subsection (AF)(b). 17,000 of the respondents are the 17,000 existing VRS, hearing point-to-point video, and IP Relay users and enterprise and public videophone responsible individuals who are updating information and are first identified in subsection (AG)(4).

(c) Total annual costs: \$261,000

14. The Commission does not anticipate any new costs to the Federal government emanating from this information collection.
15. Due to the consolidation of information collections 3060-1150 and 3060-1201 into this information collection 3060-1089, and the adoption of the *2019 VRS Program Management Order*, the *MLTS 911 and Dispatchable Location Order*, and the *VRS At-Home Call Handling Order*, there are programs changes to this information collection. Specifically, the Commission has added new information collection requirements, along with revising existing information collection requirements. Therefore, the Commission makes the following program changes as follows: the total annual number of respondents have increased by **+202,015, from 6 to 202,021 annual number of respondents**; the annual number of responses have decreased by **-1,603,630 from 3,450,036 to 1,846,406 annual number of responses**; the total annual burden hours have increased by **+277,248, from 52,334 to 329,582 annual burden hours**; and the annual cost has decreased by **-\$1,945,200, from \$2,206,200 to \$261,000 annual cost**.
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.