

## **Action Alert: FCC issues Notice to Refresh the Record on Petition to Mandate Captioned Telephone Service (CTS)**

**Comments due by July 27, 2009**

**CG Docket number 03-123**

Federal Communications Commission issued a public notice seeking to refresh the record on a Petition for Rulemaking filed in 2005 by Hearing Loss Association of American (HLAA) with sign-ons by other consumer and professional organizations. On June 10, 2009, HLAA along with 11 other organizations filed a supplement to that petition, reiterating our request for rulemaking to make captioned telephone services (like CapTel) a **mandatory service**.

In 2003, the FCC recognized captioned telephone service as a form of Telecommunications Relay Service (TRS) eligible for compensation from the Interstate TRS Fund, but did not make it a mandatory service.

### **Why request a change now?**

Captioned telephone services started in 2001. Even though captioned phone services are not mandated, all but 3 states (Delaware, Louisiana, and Massachusetts) offer captioned telephone service. But the services they offer vary widely from state to state. Because captioned telephone services (CTS) are not mandated:

- CTS services rely on the state budget process rather than a stable federal funding source supported by all telephone subscribers. In states where the budget is tight (and isn't that all states these days?) funding may be threatened. State relay administrators have no authority to request the needed funding;
- Some states restrict the number of residents who are allowed to join the program in any one month and that number varies: Michigan allows only 25 new participants, Tennessee allows 16, and New Hampshire allows only 10;
- Some states will not pay for calls made on their state-distributed captioned phones if the call is made out of state. That means you can forget about trying to take your captioned phone with you if you vacation or move to another state, if that state doesn't allow "guest users";
- Some states have little or no outreach program, so the very people who could use captioned telephone services most, have no idea that it exists.

Think about it. Could you imagine a state restricting the number of hearing people who can receive phone services? Or restricting the advertising about those phones?

### **What you can do**

If you use, or would like to use, captioned telephone services, we need to make your voice heard today. All we want you to do is tell the FCC your story:

- Do you live in a state where you have easy access to captioned telephones and services? What is that like?
- Do you live in a state that took a long time to adopt captioned telephone services? Was it difficult waiting for them to arrive?
- Do you live in a state that still does not have captioned phone services?
- Do you use two line captioned telephones and if so, has it also made telephone use easier?
- Do you use captioned phones at work?
- Do you use captioned phones to talk to family?
- Have you used captioned telephones in an emergency?

Whatever your story, however you use CapTel, we need your stories. Comments from consumers who support captioned telephone services will be very powerful

### **How to file comments**

The FCC has made it easy to file comments. This is what we suggest:

**Compose your story and save it to your computer.** It can read like a letter. It does not need to be long. For example:

I urge the Federal Communications Commission to initiate a rulemaking to mandate captioned services.

**[insert your story here:**

- **If you have a captioned telephone, talk about using captioned telephones at home, for everything from calling for pizza to hearing the voices of your children's or grandchildren's and understanding what is being said. What was it like before you had a captioned phone?**
- **If you use captioned phones at work, or have used it to get a job, mention that.**
- **If you have used captioned phones in an emergency explain what happened.**
- **If you do not have captioned telephone service, tell why it would be important for you to have that service available]**

End it by reiterating your request:

So, please, do consider mandating captioned telephone services for all those people who like me, who have come to depend on captioned telephone services. Thank you for considering my comments.

Sincerely,

[your name}

**File your comments.** Once your story is complete and saved to your computer, go to the FCC website:

<http://www.fcc.gov/cgb/ecfs>

That page gives you instructions on how to file a comment. On the upper right hand corner of this page is a link "submit a filing". The page itself has a form that you can complete. If you need guidance, read on.

If you need help submitting your comments, the following is a step by step guide.

**File your comments.** Once your story is complete and saved to your computer, go to the FCC website:

<http://www.fcc.gov/cgb/ecfs>

That page gives you instructions on how to file a comment. On the upper right hand corner of this page is a link "submit a filing". That will bring you to a page that looks like the following:

## Electronic Comment File Submission

*Sending your comment is a 2-step process. The first step is to complete the Cover Sheet below. The second step is to choose one of the two transmittal methods: sending a file, or sending a short message that you type directly on this page.*

Cover Sheet		
1. <a href="#">Proceeding</a> (e.g. 00-221, RM-9920) (required)		
<input type="text"/>		
2. Mail Correspondence To: (required) <input type="checkbox"/> Name <input type="checkbox"/> Law Firm <input type="checkbox"/> Attorney		
3. Name of Applicant/Petitioner (required)		
<input type="text"/>		
4. Law Firm Name (required if represented by counsel)		
<input type="text"/>		
5. Attorney Name (optional)		
<input type="text"/>		
6. Email-id (optional)		
<input type="text"/>		
7. Mailing Address For Correspondence (required)		
<input type="text"/>		
<input type="text"/>		
8. City (required)	9. State (required)	10. Zip Code (required)
<input type="text"/>	<input type="text"/>	<input type="text"/>
11. Ex-Parte/Late Filed <input type="checkbox"/> (optional)	12. <a href="#">Document Type</a> (required)	
	<input type="text" value="COMMENT"/>	

13. File Number  
(optional)

Please complete **ONE** of the following:

### Send Comment Files to FCC (Attachments)

File Description:

COMMENT

File:

Select one of these file types or convert your file to one of these types:

OR

### Send a Brief Comment to FCC (typed-in)

If you are entering over 70 characters on one line  
be sure to press your carriage return to ensure proper line -wrapping.

To fill out the "Cover Sheet":

1. **Proceeding** (e.g. 00-221, RM-9920) (required)  
Even though the docket number is "CG Docket No. 03-123" you should only fill out the numbers "03-123" for the captioned telephone comments – it will not accept your comments if you include the letters "CG" or "Docket No."
2. **Mail Correspondence To:** (required)  
**Click on** "name" – that's you.
3. **Name of Applicant/Petitioner** (required)  
Type in your name
4. **Law Firm Name** (required if represented by counsel)  
No need to fill this out – unless you are the attorney filing for another.
5. **Attorney Name** (optional)
6. **Email-id** (optional)

This is optional – we suggest you leave your email contact information.

7. **Mailing Address For Correspondence** (required)

8. **City** (required)

9. **State** (required)

10. **Zip Code** (required)

11. **Ex-Parte/Late Filed**

No need to complete this

12. **Document Type** (required)

The word "COMMENT" should already have appeared here. If it does not, click the arrow button on the right hand side of the box, and scroll down to the word, COMMENT.

13. **File Number** (optional)

No need to fill out a file number

Once the cover sheet has been completed, you can send your comments either by sending it as an attachment, using your browser to find the file in your computer (recommended)

*Please complete **ONE** of the following:*

**Send Comment Files to FCC (Attachments)**

<b>File Description:</b>	<input type="text" value="COMMENT"/>	<b>File:</b>	
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Select one of these file types or convert your file to one of these types:

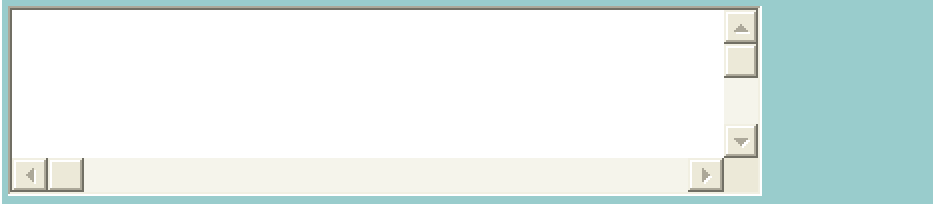
**OR**

by copying and pasting in the window below that

**OR**

**Send a Brief Comment to FCC (typed-in)**

**If you are entering over 70 characters on one line be sure to press your carriage return to ensure proper line -wrapping.**



When you are finished, hit "send". You should receive a receipt from the FCC regarding your filing.