FHH Telecom Law
February 2006

In Brief

The FCC has opened a rulemaking proceeding to consider how to make E-911 service available to deaf people who try to contact emergency service providers using VRS or IP Relay connections. VRS is an internet-based method of using a real-time video image to convey sign language from a deaf person to a translator who can then convey the message orally to the recipient of the call and then translate the response back using sign language as well. The technique permits a smoother and quicker conversational interface than the cumbersome typed TTY connection of the past. IP Relay is essentially a TTY-like typed interface between the deaf person and a translator who then conveys the spoken message to the recipient. However, the typed message can be conveyed over the internet without the need for a TTY connection. In both cases, because the connection is established over the internet, there is no way of knowing for sure the physical location of the calling party. The lack of call origination information adversely affects the ability of public safety responders to locate callers who cannot convey their location. In this instance, however, the internet is a great leveler because deaf people are no worse off in this regard than others who use the internet to initiate an emergency "phone call." The internet is blind to the location of *any* call origination. Having already established rules in an attempt to address this problem for the public at large, the FCC is now proposing to extend those solutions (e.g., mandatory registration of the physical location of computers used to make E-911 calls) to VRS and IP Relay calls also. Other tweaks in the registration process and/or TRS funding process to deal with this issue are under consideration. Comments were due January 18, 2006, but replies may still be filed on Feb. 1.