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More 'Assertive' FCC

Outreach Woes Persist as TRS Transition to 10-Digit Numbers Looms

by Adam Bender

Unless the FCC sharpens its outreach, thousands of people who are deaf may be left without functionally equivalent phone service, said consumer advocates and telecom relay service providers during a workshop Friday at the FCC. Video and IP-based relay users must register 10-digit numbers or they won't be able to make non-emergency calls after Nov. 12 (CD Aug 12 p1). The deadline has already been extended over concerns about consumer confusion, lack of public education, and technical issues. But education problems remain, workshop attendees said.

"The tone of the [outreach] message has to be upped significantly," said Karen Strauss, a legal adviser to Communication Services for the Deaf and a former FCC disabilities access expert. "This ... is a lot more urgent" than the outreach problem faced by the FCC in the DTV transition, she said. The DTV transition meant some could lose TV access. People who are deaf could lose their "communications to the world" Nov. 12, Strauss said.

The FCC must develop "a more assertive strategy," agreed Kelby Brick, vice president of relay provider Purple Communications. "There are thousands upon thousands of people who on November 12 will be out of service. If they're driving and have a flat tire, they're going to be unable to get help. If someone is sick and needs urgent medical care, they're not going to be able to call their doctor."

Putting the deadline off again must remain on the table, said Rosaline Crawford, director of the National Association of the Deaf's law and advocacy center. "If our next-step outreach is not effective," the FCC should consider "a softer transition period or some other modification of that hard deadline."

Extending the registration deadline may not be the right answer, said Greg Hlibok, an attorney in the FCC's Consumer & Governmental Affairs Bureau. He agreed that the FCC must elevate the tone of its message. "If there were an extension of the deadline, would that really help the situation?"

The FCC is "uniquely positioned to do some things, but we definitely think it's more a partnership than just the FCC," said the bureau's deputy chief, Mark Stone. Bureau Chief Cathy Seidel said the commission is looking for "specific things that can be done by the providers, by the FCC, by [consumer groups], by any of us here to get people to act between now and Nov. 12 so that when they try to make a relay call, they actually get the call through." The commission wants to know "how we might do messaging, materials we might put together, comments we could make while we're out and about talking to consumers around the country," and where to concentrate outreach efforts, she said.

One way to improve consumer registration may be to "drive home" the public-safety benefits of having a 10-digit number, Seidel said. "Really, bottom line, what's in it for them is if they place a 911 call, people will know how to reach them."

Workshop participants said registration is most anemic among users of IP text relay, a service that commonly takes the form of an app on a user's cellphone. Some reports indicate that less than 20 percent of outgoing IP relay calls are made by registered users, Crawford said. A major source of confusion for an IP relay user is the need to register a number for the relay service besides the one that the user's carrier has assigned the handset, said Al Sonnenstrahl, a consumer advocate with the E911 Stakeholder Council. Registration for video relay service has gone much better, partly because providers can display advisory notices on users' video screens, said Jim House, a spokesman for consumer group Telecommunications for the Deaf and Hard of Hearing.

There's a shortage of broadly distributed, neutral information about the transition to 10-digit numbers, Crawford said. The FCC and consumer groups like the National Association of the Deaf have done some outreach, "but getting people to that neutral information is an overwhelming task when the majority of the education and outreach is being provided by specific providers that obviously have a commercial interest in signing people up for their particular service." The FCC should follow the outreach model it used for the DTV transition and consider hiring a contractor or giving a grant to an independent body to

step up neutral outreach, said Snap VRS General Counsel Jeff Rosen. An inexpensive alternative might be for the agency to require providers to use a "standardized" outreach message to reduce bias, Strauss said.

Providers and consumer groups agreed that one-on-one contact has been the most effective form of outreach. Talking to a "live person" is the best way for a consumer to be reassured and get questions answered, Crawford said. That could be by video conversation, instant message chat, exhibit booth or event, she said. An FCC hotline accessible in multiple formats would be "incredibly critical," Strauss said.

Relay providers must be prepared Nov. 13 to quickly deliver numbers and make them work, Crawford said. There could be problems, she said: Relay companies are concerned about providing geographically appropriate phone numbers, and it takes time to register numbers in the TRS database. "If there is going to be any delay ... between registering and being functional, there's got to be a system for providing temporary access to make phone calls."

Purple has operators "ready to register people on the spot," and support staff "queued up at the stroke of midnight," Brick said. "That's the easy part." But he said he fears that those who have lost their hearing as adults, such as veterans, and who may be new to relay and not plugged into the deaf community, may not be reached by education efforts. It would be a "tragedy" if those people "withdraw from society and become reclusive," he said. "We cannot afford to let that happen."