

Dear CapTel Equipment Program,

This is to inform you of a change over the coming months that may impact some of the CapTel users in your Equipment Distribution Program.

The Federal Communications Commission (FCC) now requires that all users of Internet-based Captioned Telephone service must register. This includes people who received their CapTel phone some time ago and have been using it all along.

Who needs to register? Customers with any of the following models:

- CapTel 840i
- CapTel 880i
- CapTel 2400i
- CapTel 800i (*800i users must register online*)

CapTel 800 / CapTel 840 users do NOT need to register.

In many cases, customers may have already registered so no action is required. In some cases, however, users will need to register a CapTel phone that they have already been enjoying for years.

Users who need to register will see a message on their CapTel display screen telling them what to do.

Registering is easy.

Online: www.CapTel.com/register

Registration Hotline: [1-877-202-9578](tel:1-877-202-9578)

CapTel Customer Service: [1-888-269-7477](tel:1-888-269-7477)

Download registration form and fax/mail/email in

Please note: per FCC requirements, the registration process asks for personal information including a user's birthdate and last 4 digits of the user's social security number. If users are concerned about providing this information, please refer them to the FCC Public Notice (attached) confirming the request is legitimate.

If users contact you with questions, please refer them directly to the CapTel Registration Hotline at [1-877-202-9578](tel:1-877-202-9578) or online at www.CapTel.com/register. We're happy to help users through this process.

We recognize these FCC requirements may cause customers inconvenience, and appreciate all you do to help support and reassure CapTel users through the registration process.

Sincerely,

Shelly Stein
Customer Service Supervisor

WCI
1500 Olympic Blvd
Santa Monica, CA 90404
[800-233-9130](tel:800-233-9130) V/TTY
[310-260-9363](tel:310-260-9363) Direct
[310-450-9918](tel:310-450-9918) Fax
Shelly.stein@weitbrecht.com
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PUBLIC NOTICE

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PERSONAL INFORMATION REQUIRED FOR CONSUMERS TO REGISTER FOR INTERNET PROTOCOL CAPTIONED TELEPHONE SERVICE AND APPLICABLE CONFIDENTIALITY SAFEGUARDS

CG Docket Nos. 13-24 & 03-123

The Federal Communications Commission's (FCC or Commission) Consumer and Government Affairs Bureau (Bureau) understands that some IP CTS providers have received inquiries regarding the need to collect personal information from consumers wishing to register for Internet Protocol Captioned Telephone Service (IP CTS), and the extent to which such information will be kept confidential.¹ To guard against TRS fraud, abuse, and waste, in August 2013, the FCC adopted regulations requiring consumers who are registering for IP CTS to provide the following information to their IP CTS providers: full name, date of birth, address, telephone number, and the last four digits of the consumer's social security number.² Each IP CTS provider must obtain this information from all users of IP CTS, regardless of when these individuals began receiving these relay services.³ In addition, consumers must certify that, among other things, they have a hearing loss that necessitates IP CTS to communicate by phone.⁴

¹ IP CTS is a form of telecommunications relay service (TRS) that permits an individual who can speak but who has difficulty hearing over the telephone to use a telephone and an Internet Protocol-enabled device to simultaneously listen to the other party and read captions of what the other party is saying. With IP CTS, the connection carrying the captions between the relay service provider and the relay service user is via the Internet, rather than the public switched telephone network. 47 C.F.R. § 64.601(12).

² 47 C.F.R. § 64.604(c)(9)(i). See also *Misuse of Internet Protocol (IP) Captioned Telephone Service; Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities*, CG Docket Nos. 13-24 and 03-123, Report and Order and Further Notice of Proposed Rulemaking, 28 FCC Rcd 13420, 13449, ¶ 64, 13452, ¶ 69 (2013) (*IP CTS Reform Order*).

³ 47 C.F.R. § 64.604(c)(9)(i), (xi).

⁴ 47 C.F.R. § 64.604(c)(9)(ii)-(xi). We note that recently adopted regulations governing the provision of video relay service (VRS), a form of TRS that allows people with disabilities who use sign language to communicate with voice telephone users through video equipment and communication assistants (47 C.F.R. § 64.601 (27)), similarly require providers to obtain such personal information as part of the registration and certification of VRS users. 47 C.F.R. § 64.611(a)(4). See also *Structure and Practices of the Video Relay Services 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, 8650, ¶ 70 (2013) (*VRS Structural Reform Order*). The required information, including the last four digits of the social security number or Tribal Identification number, if the registered Internet-based TRS user is a member of a Tribal nation and does not have a social security number, is generally comparable to information required for registration with the FCC's Lifeline program. See 47 C.F.R. § 54.410(d)(2).

We take this opportunity to reaffirm that, under FCC regulations, IP CTS providers must maintain the confidentiality of the personal information obtained from consumers through their registration and certification. Specifically, Commission regulations require that each IP CTS provider “maintain the confidentiality of . . . registration and certification information” and prohibit VRS and IP CTS providers from “disclos[ing] such registration and certification information or the content of such registration and certification information except as required by law or regulation.”⁵

The full text of this *Public Notice* is available for public inspection and copying during regular business hours at the FCC Reference Information Center, Portals II, 445 12th Street, SW, Room CY-A257, Washington, DC, 20554. This document may be purchased from the Commission's duplicating contractor, Best Copy and Printing, Inc., Portals II, 445 12th Street, SW, Room CY-B402, Washington, DC 20554. Customers may contact BCPI at their web site: www.bcpiweb.com or call 1-800-378-3160.

To request this document in accessible formats for people with disabilities (braille, large print, electronic files, audio format), send an e-mail to fcc504@fcc.gov or call the Consumer & Governmental Affairs Bureau at 202-418-0530 (voice), 202-418-0432 (TTY). This *Public Notice* can also be downloaded in Word and Portable Format at <http://www.fcc.gov/encyclopedia/disability-rights-office>.

For further information, please contact Cheryl King, Consumer and Governmental Affairs Bureau, Disability Rights Office, at (202) 418-2284 or e-mail at Cheryl.King@fcc.gov.

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⁵ 47 C.F.R. § 64.611(a)(3)(iv). The requirement to maintain the confidentiality of a registered relay user's personal information also applies to information provided by registered VRS users. 47 C.F.R. § 64.604(c)(9)(x).