

FCC Consumer Advisory

Ten-Digit Numbering and 911 Calls for Internet-Based TRS: What They Mean for Users

Overview

Since December 31, 2008, persons with hearing and/or speech disabilities who use Video Relay Service (VRS) or Internet Protocol Relay (IP Relay) – two forms of Internet-based Telecommunications Relay Service (TRS) – have been able to obtain ten-digit telephone numbers from their VRS or IP Relay provider. These are the ten-digit telephone numbers used by voice telephone users. New Federal Communications Commission (FCC) rules require that VRS and IP Relay users be able to make and receive calls using their new ten-digit numbers, and be able to make 911 calls and have those calls – AND the caller’s ten-digit number and location information – routed to the appropriate public safety answering point, ensuring 911 service comparable to the 911 service provided through the traditional telephone network.

This advisory contains important information for VRS and IP Relay users on how to obtain a ten-digit number, what the new FCC rules require providers to do, and how the new 911 call handling requirements will result in more functionally-equivalent 911 access for VRS and IP Relay users. At this time, captioned telephone service (CTS) providers are not required to provide ten-digit numbers to consumers, but interim regulations have been established for handling emergency calls.

Ten-Digit Geographic Numbers

Ten-digit geographic telephone numbering has been the standard used for voice telephone service in North America for decades. Ten-digit numbers consist of a three-digit area code that corresponds to the consumer’s geographic address, followed by a three-digit number associated with the consumer’s local telephone exchange, then a four-digit number unique to the end user. With a ten-digit geographic number, VRS and IP Relay users can be reached through a single number that will automatically connect to the user’s primary (“default”) VRS or IP Relay provider and allow the provider to determine the user’s IP address for purposes of delivering incoming calls made to that number. In other words, voice telephone users calling a VRS or IP Relay user through a relay provider will no longer have to dial the telephone number of a provider and then give the provider the current IP address of the VRS or IP Relay user so that the communications assistant (CA) can connect the call. Instead, they will simply dial the VRS or IP Relay user’s assigned ten-digit geographic telephone number.

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How to Obtain a Ten-Digit Geographic Number

VRS and IP Relay users may obtain a ten-digit geographic number by contacting and registering with the VRS or IP Relay provider of their choice. This provider becomes the consumer's "default" provider, although a consumer can still use other providers to make and receive calls. Although consumers must choose one default provider, they are free to switch default providers, just as voice telephone users can switch telephone providers and keep their ten-digit numbers.

Who May Obtain a Ten-Digit Geographic Number

Any individual with a hearing and/or speech disability who wishes to use VRS or IP Relay may obtain a ten-digit geographic number. During the registration process, users will be asked to certify that they have a medically-recognized hearing or speech disability that necessitates their use of VRS or IP Relay.

Registering with a Default Provider

Once a VRS or IP Relay user selects and registers with a provider, this provider becomes the user's "default provider." When a user registers, the provider must obtain the user's physical address, or "Registered Location," at which the VRS or IP Relay service will first be used. Providers also must give users an easy way to update their location information if it changes, without cost or additional equipment. Registration enables VRS and IP Relay providers to match their users' telephone numbers with the users' IP addresses to properly route and complete calls, and obtain their users' physical locations in order to provide 911 service. Thus registration, including the updating of users' Registered Location information, is critical to ensuring that providers can route all calls properly, especially emergency calls to appropriate emergency services personnel.

Users of VRS and/or IP Relay are reminded, if they have not done so already, to register with the VRS or IP Relay provider of their choice as soon as possible, and no later than November 12, 2009. After November 12, 2009, all VRS and IP Relay users must be registered with a default provider in order to place a non-emergency call through any VRS or IP Relay provider. In addition, after that date, VRS and IP Relay providers will no longer complete calls to a "proxy" or "alias" number that may have been previously obtained from a provider.

Users may register with any VRS or IP Relay provider they choose, regardless of any prior relationship they may have had with another VRS or IP Relay provider. The default provider will route and deliver all of the user's incoming and outgoing calls, unless the user chooses to place a call with, or receives a call from, an alternate provider. Consumers may change their default providers at any time.

Permissive Dialing Period. Between December 31, 2008, and November 12, 2009, VRS or IP Relay users who have received ten-digit geographic numbers may still receive calls to their former "proxy" or "alias" numbers. Default providers will provide messages notifying callers of their users' new ten-digit geographic numbers and advising callers

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that, after November 12, 2009, users may only be reached by dialing the new number. (Please note that, after November 12, 2009, any toll-free number used to route VRS or IP Relay calls must be directed to the appropriate ten-digit geographic number.)

Placing or Receiving Calls Through an Alternate Provider (“Dial-Around” Calls)

VRS and IP Relay users are not limited to placing or receiving calls through their default provider. They have the right to place or receive calls through any authorized VRS or IP Relay provider, as they have done in the past, without any penalty or retaliation from their default provider. Users can place a call through an alternate provider by clicking on the URL Internet address of the provider, or by dialing the toll-free number of the provider they wish to handle their call. Default providers may not configure their end user equipment to make reaching an alternate provider more difficult after ten-digit numbering than before ten-digit numbering. Similarly, VRS and IP Relay users may receive calls from voice telephone users dialing a provider’s toll-free number and asking to be connected to the VRS or IP Relay user’s ten-digit geographic number.

Changing Default Providers (Functionality of End User Equipment After the Switch)

VRS or IP Relay users may select and register with a new default provider at any time and may also have their ten-digit geographic numbers transferred (“ported”) to that provider. The procedures for porting a VRS or IP Relay telephone number and a voice telephone number are the same. For more information on local number portability, see the FCC’s consumer fact sheet at www.fcc.gov/cgb/consumerfacts/numbport.html.

VRS or IP Relay users switching to a new default provider and porting their numbers are entitled to keep equipment supplied by another VRS or IP Relay provider. The new default provider must work with the users’ equipment to ensure that users can make and receive VRS and IP Relay calls, as well as point-to-point (non-relay) calls. Users should not assume that enhanced features of the equipment, such as missed call lists or speed dial lists, will still be available after switching default providers. Because providers offer these features on a competitive basis, users should ask, prior to selecting or changing default providers, whether and how a prospective default provider can provide enhanced services on the user’s equipment.

Limits on the Assignment of Ten-Digit Geographic Numbers

Users may obtain separate ten-digit geographic numbers for different services (for example, one number for VRS and a second number for IP Relay). The FCC’s rules do not prohibit a provider from offering a feature that automatically forwards incoming calls to one service (VRS, for example) to the user at another service (IP Relay, for example), if both numbers are obtained from the same provider and if this arrangement does not result in additional costs to the Interstate TRS Fund.

For the same service, a user also may obtain separate ten-digit geographic numbers for devices placed at different locations (for example, one VRS device at home and another

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at the office). As noted above, the FCC's rules do not prohibit a provider that has issued more than one ten-digit geographic number for the same service (but different devices) from offering a feature that automatically forwards an incoming call to an Internet address associated with one telephone number to the user at an Internet address associated with another telephone number, if forwarding does not result in additional costs to the Interstate TRS Fund.

Individual Toll-Free Numbers

Some VRS and IP Relay providers have already issued individual, toll-free numbers that permit calls to users from anywhere within the United States without incurring long distance charges (the call is free of charge to the calling party). VRS or IP Relay users may retain current toll-free numbers or obtain new toll-free numbers if: (1) they have also been assigned ten-digit geographic numbers by November 12, 2009, (the last day of the permissive dialing period); (2) the toll-free numbers are directed to users' ten-digit geographic numbers by that date; and (3) such arrangements do not result in additional costs to the Interstate TRS Fund.

Numbering Costs

Consistent with the Communication Act's functional equivalency mandate, costs typically paid by voice telephone users are not compensable from the Interstate TRS Fund. These costs include: (1) the costs of obtaining a ten-digit geographic number; (2) the costs of obtaining and using an individual toll-free telephone number; and (3) 911 charges that may be imposed under a state or local 911 funding mechanism. To protect consumers, the FCC requires any VRS or IP Relay provider wishing to pass on to users any non-compensable, numbering-related costs to first obtain approval from the FCC.

Emergency 911 Calls Using VRS or IP Relay

Under the FCC's new emergency call handling rules, VRS and IP Relay users will be able to make an emergency call through their default provider and have the call, along with the ten-digit number and Registered Location of the caller, automatically route to an appropriate public safety answering point (911 call center). In addition, all 911 emergency calls made through VRS or IP Relay must receive priority attention so that they will be answered by the first available CA ahead of all other non-emergency calls.

Users are strongly encouraged to provide accurate and up-to-date Registered Location information to their default provider, both when registering with their default provider and ANY time they change the location from which they are using the service. Without accurate and up-to-date location information, providers will be unable to send accurate location information or route 911 calls to appropriate emergency personnel. Remember, in an emergency, seconds count – please keep your Registered Location information updated at all times.

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Emergency Calling Tips for VRS and IP Relay Users

- Make sure you are familiar with your provider's procedures for updating your Registered Location, and promptly update the information any time it changes.
- Know any limitations of your service; for example, have a plan for making emergency calls in the event of a power or Internet outage. You may want to keep a TTY and traditional phone line, or install a backup power supply.
- Inform children, babysitters, and visitors about using your VRS or IP Relay service; the limitations, if any, on placing emergency calls; and all information needed in the event of an emergency. Keep instructions for using the service, as well as your address and other information, written down and near your VRS or IP Relay equipment.

Filing a Complaint with the FCC

If you have a problem completing a 911 call, the important thing is to first reach help. Either dial-around to another provider to tell someone about the emergency (including your location), or utilize your back-up plan for emergency calling. As soon as practicable after the emergency, notify your provider of any problem completing a 911 call through that provider. If your provider cannot or does not properly address any problem, you can file a complaint with the FCC. There is no charge for filing a complaint. The easiest way to file your complaint is to go to the FCC's on-line complaint forms found on the FCC Web site at esupport.fcc.gov/complaints.htm. You will be asked a series of questions that will take you to the correct form for providing all of the information the FCC needs to process your complaint. You can also file your complaint with the FCC's Consumer Center by emailing fccinfo@fcc.gov; calling 1-888-CALL-FCC (1-888-225-5322) voice or 1-888-TELL-FCC (1-888-835-5322) TTY; faxing 1-866-418-0232; or writing to:

Federal Communications Commission
Consumer & Governmental Affairs Bureau
Consumer Inquiries and Complaints Division
445 12th St., SW
Washington, DC 20554.

What to Include in Your Complaint

The best way to provide all the information the FCC needs to process your complaint is to complete fully the on-line complaint form. When you open the on-line complaint form, you will be asked a series of questions that will take you to the particular section of the form you need to complete. If you do not use the on-line complaint form, your complaint, at a minimum, should indicate:

- your name, address, email address, and phone number where you can be reached;

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- whether you are filing a complaint on behalf of another party, and if so, the party's name, address, email address, day time phone number, and your relationship to the party;
- preferred format or method of response (letter, fax, voice phone call, email, TRS, TTY, ASCII text, audio recording, or Braille);
- that your complaint is about TRS;
- the name, address, and telephone number (if known) of the company or companies involved with your complaint; and
- a brief description of your complaint and the resolution you are seeking.

For More Information

For more information about TRS, VRS, or IP Relay, or to learn more about FCC programs to promote access to telecommunications services for people with disabilities, visit the FCC's Disability Rights Office Web site at www.fcc.gov/cgb/dro. For information about other telecommunications issues, visit the FCC's Consumer & Governmental Affairs Bureau Web site at www.fcc.gov/cgb, or contact the FCC's Consumer Center using the information provided for filing a complaint.

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