

Nov. 6, 2020

## Groups Urge FCC to Seek More Info on IP CTS Application

Ten organizations representing deaf and hearing-impaired individuals and supporting technologies have urged the FCC to seek additional information from ClearCaptions LLC regarding its latest amendment to its application for certification as a provider of IP CTS (Internet protocol captioned telephone service) using automatic speech recognition (ASR) software.

In joint comments filed in CG docket 03-123 yesterday, the Hearing Loss Association of America (HLAA) and nine other organizations said, “We remain concerned about the Commission’s approach of reviewing and blessing ASR-based provider certifications without first creating technology-neutral minimum standards and ensuring that sufficient information is made available to the public regarding each provider’s specific ASR offerings. In October, the Commission finally began the process of developing a record on adding quality metrics for IP CTS offerings to the minimum TRS standards. Yet since 2019, the Commission has sought comment on certifying four ASR-based IP CTS offerings in addition to ClearCaptions, including MachineGenius, Clarity, VTCSecure, and Innocaption. Consumer Groups and accessibility researchers lodged concerns about each of those applications.”

The joint commenters noted that the FCC’s Consumer and Governmental Affairs Bureau has granted conditional certification to MachineGenius and Clarity, while reserving “full certification pending detailed evaluation of consumer complaints and testing data and potential site visits.” The VTCSecure and Innocaption applications are pending.

“It remains unclear when or how the Bureau will evaluate those applications or this one, or how the Bureau’s oversight of the conditionally certified applications will unfurl in the midst of the chaos of the COVID-19 pandemic, or how the ultimate adoption of metrics will affect the conditional certifications of ASR-based offerings,” the joint commenters added.

They continued, “The Commission continues to place the cart before the horse in approving ASR-based applications, turning them loose on consumers in the hopes that problems with quality, privacy, and 911 connectivity will not result in serious harm.”

They said that they “appreciate ClearCaptions’s good faith willingness to engage on the record with Consumer Groups’ and accessibility researchers’ questions about the ClearCaptions application.”

“Several questions remain for us about quality, call volume, and privacy. We hope ClearCaptions will expand on these questions its reply comments and that the Commission will ensure it has full answers to them before ruling on the ClearCaptions application.”

Joining HLAA in the comments were Telecommunications for the Deaf and Hard of Hearing, Inc., the National Association of the Deaf, the Association of Late-Deafened Adults, the Cerebral Palsy and Deaf Organization, Deaf Seniors of America, the National Cued Speech Association, Cuesign, Inc., the Deaf/Hard of Hearing Technology Rehabilitation Engineering Research Center (DHH-RERC), and the Rehabilitation Engineering Research Center on Universal Interface & Information Technology Access (IT-RERC). —Lynn Stanton, [lynn.stanton@wolterskluwer.com](mailto:lynn.stanton@wolterskluwer.com)

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