

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554**

In the Matter of	)	
	)	
Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities	)	CG Docket No. 03-123
	)	
Structure and Practice of the Video Relay Service	)	CG Docket No. 10-51
	)	
Misuse of Internet Protocol Relay Service	)	CG Docket No. 12-38

**REPLY COMMENTS OF INCOMPAS**

INCOMPAS, by its undersigned counsel, hereby submits these comments in response to the Federal Communications Commission’s (“Commission” or “FCC”) *Notice of Proposed Rulemaking* proposing to expand the Telecommunications Relay Services (“TRS”) Fund contribution base for support of Video Relay Services (“VRS”) and Internet Protocol Relay Services (“IP Relay”) to include intrastate, in addition to interstate, end-user revenues from providers of telecommunications and Voice over Internet Protocol (“VoIP”) services.<sup>1</sup>

INCOMPAS, the internet and competitive networks association, represents a number of telecommunications and VoIP service providers that would be impacted by the inclusion of intrastate end-user revenues in the TRS Fund contribution base. INCOMPAS aligns itself with other commenters in the record urging the Commission to be mindful of the financial burden this

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<sup>1</sup> See *Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities; Structure and Practice of the Video Relay Service Program; Misuse of Internet Protocol Relay Service*, CG Docket Nos. 03-123, 10-51, 12-38, Notice of Proposed Rulemaking, FCC 20-161 (rel. Nov. 20, 2020) (“*Notice*”).

could impose on these providers.<sup>2</sup> Like other associations, INCOMPAS members report that the Commission’s expansion of the TRS base for Internet Protocol Captioned Telephone Service (“IP CTS”) led to unexpected and significant increases to the size of their contributions as well as disruptions for the provider and their customers.<sup>3</sup> Specifically, as Uniti mentions in its comments, the IP CTS modification “resulted in the expansion of the contribution base in the middle of an E-rate planning season, and therefore did not give schools and service providers time to incorporate the fee change into their bids or other planning processes.”<sup>4</sup> As such, INCOMPAS concurs with Uniti and others that the Commission should consider, at minimum, a 12-month implementation timeframe so that they have sufficient time to adjust to the VRS and IP Relay proposal.<sup>5</sup> This will “avoid a potentially significant undue disruption to E-rate customers” and service providers implementing this significant change to the contribution base.<sup>6</sup>

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<sup>2</sup> See Comments of NCTA—The Internet & Television Association, CG Docket Nos. 03-123, 10-51, 12-38 (filed Apr. 19, 2021), at 1 (“NCTA Comments”); Comments of Uniti Group, Inc., CG Docket Nos. 03-123 and 10-51 & RM-11820 (filed Apr. 19, 2021), at 2-3 (“Uniti Comments”); Comments of NTCA—The Rural Broadband Association, CG Docket Nos. 03-123, 10-51, 12-38 (filed Apr. 19, 2021), at 2-3 (“NTCA Comments”).

<sup>3</sup> See NCTA Comments at 1 (reporting that the inclusion of intrastate revenues increased members’ IP CTS contribution by 67-75%); NTCA Comments at 2-3 (reporting TRS billing increases of 100% across its membership).

<sup>4</sup> Uniti Comments at 3.

<sup>5</sup> *Id.* at 1, 4 (seeking “a transition period long enough for service providers and E-Rate applicants to make the necessary contractual, budgeting, and administrative adjustments necessary to effectuate such a change without undue disruption to the E-Rate program”). See also Comments of USTelecom—The Broadband Association, CG Docket Nos. 03-123, 10-51, 12-38 (filed Apr. 29, 2021), at 2 (requesting that the Commission “target July 1, 2022 as an implementation date” which would give USTelecom’s members “the additional time necessary to adjust their systems”).

<sup>6</sup> Uniti Comments at 1-2.

For the reasons stated herein, INCOMPAS urges the Commission to consider the recommendations in its reply comments as it determines whether to make modifications to the TRS Fund contribution base for support of VRS and IP Relay.

Respectfully submitted,

INCOMPAS

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