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

FCC rules require persons with hearing and speech disabilities using Video Relay Service or Internet Protocol Relay – two forms of Internet-based Telecommunications Relay Service – to obtain and register ten-digit telephone numbers with their preferred TRS service provider to ensure location information can be relayed to appropriate emergency personnel, including those close to the caller's location, during 911 calls. FCC rules ensure that VRS and IP Relay users are provided 911 service comparable to the service provided through the traditional telephone network.

How does Internet-based TRS work?

TRS services permit persons with a hearing or a speech disability to communicate with persons they wish to contact through a relay provider. TRS users call providers through a text-based device (for example, a text telephone or TTY) and are aided by communications assistants who make voice telephone calls to the parties the TRS user wishes to reach, relaying calls back and forth - through text and voice - between the two parties.

The two most commonly-used forms of Internet-based TRS are VRS and IP Relay. A third type of is IP Captioned Telephone Service, not yet subject to ten-digit numbering rules.

VRS allows persons whose primary language is American Sign Language to communicate in ASL using video equipment and a broadband Internet connection. The communications assistant speaks what is signed to the called party, and signs the called party's response back to the caller.

IP Relay allows a person to communicate in text using an IP-enabled device and the Internet, rather than TTY and the traditional telephone network.

Internet Protocol Captioned Telephone Service allows a person who can speak and who has some residual hearing to simultaneously listen to what is said over the telephone and read captions of what the other person is saying.

Benefits of ten-digit numbers

With ten-digit telephone numbers registered with a preferred VRS or IP Relay provider, users can:

- Make an emergency call through their preferred VRS or IP Relay provider and have the call, along with the ten-digit number and location information, automatically route to the appropriate public safety answering point, or “911 call center,” so that emergency personnel can be dispatched.
- Receive calls from voice telephone users calling the ten-digit number assigned to the VRS or IP Relay user. (The caller does not need to know the VRS or IP Relay user's IP address to make the call.)
- Make a call directly to, or receive a call directly from, another person using VRS or IP Relay equipment by dialing a ten-digit number.
VRS or IP Relay users can change default relay providers at any time, but still keep the same telephone number. Providers cannot impose any restrictions or conditions when users request that their number be ported to a new default provider.

In addition, calls can be placed through providers other than the default provider by clicking on the URL or address of the other provider. Hearing callers may also place a call with another provider (other than the default provider) by dialing the 800 number of the provider they wish to handle their call.

Emergency calling tips for VRS and IP Relay users

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.

- Make sure you are familiar with your provider’s procedures for updating your registered physical location, and promptly update the information if it changes.
- Know any limitations of your service, and 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. Dialing 911 from a TTY remains the most reliable and fastest method of reaching emergency personnel.
- Inform children, babysitters and visitors about using your TRS service and the limitations, if any, on placing emergency calls.

TRS provider responsibilities

FCCs rules require VRS and IP Relay providers to:

- Obtain from their users the physical location at which the service will first be used when the users register for ten-digit numbers.
- Give users an easy way to update their registered location information if it changes, without cost or additional equipment.
- Route all emergency calls to the appropriate 911 call center and transmit the call-back number and registered location of the caller, the name of the provider and the CA’s identification number.
- Publish a summary of these new procedures, emphasizing the need to keep location information updated, on their websites and in any promotional materials addressing emergency call handling.
- Obtain and keep records of affirmative acknowledgement from their registered users that they have received and understood the provider’s summary.

Interim emergency call handling procedures for IP CTS

The FCC currently requires IP CTS providers to automatically and immediately transfer an emergency call to the appropriate 911 call center or assure that appropriate personnel are notified of the emergency.
Further, IP CTS providers must:

- Prioritize incoming emergency calls over non-emergency calls.
- Request the caller's name and location at the beginning of the emergency call process for Internet-based TRS callers to update their location information.
- Deliver to emergency personnel at the beginning of the call the name of the Internet-based TRS user and location of the emergency, the name of the provider, the communication assistant's callback and identification numbers.
- Reestablish contact between the caller and the emergency personnel or other authority if either or both legs of the call are disconnected.

Filing a complaint

You have multiple options for filing a complaint with the FCC:

- File a complaint online at https://consumercomplaints.fcc.gov
- By phone: 1-888-CALL-FCC (1-888-225-5322); TTY: 1-888-TELL-FCC (1-888-835-5322); ASL: 1-844-432-2275
- By mail (please include your name, address, contact information and as much detail about your complaint as possible):

  Federal Communications Commission  
  Consumer and Governmental Affairs Bureau  
  Consumer Inquiries and Complaints Division  
  445 12th Street, S.W.  
  Washington, DC 20554

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Last Reviewed: 8/31/17