

**Before The
Federal Communications Commission
Washington, D.C. 20554**

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| In the Matter of |) | |
| |) | |
| Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities |) | CG Docket No. 03-123 |
| |) | |
| Speech-to-Speech and Internet Protocol (IP) Speech-to-Speech Telecommunications Relay Services |) | CG Docket No. 08-15 |
| |) | |

**COMMENTS OF THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

On November 21, 2025, the Federal Communications Commission (FCC) released a *Notice of Proposed Rulemaking* (Notice) in the above-captioned proceeding.¹ The FCC set forth its intention to “initiate[] a comprehensive proceeding to modernize telecommunications relay services (TRS).”² The Pennsylvania Public Utility Commission (Pa. PUC) hereby provides its comments in response to the FCC’s proposal in the Notice to terminate the mandatory status of teletypewriter relay service (TTY Relay).³

¹ Public Notice, FCC-25-79 (November 21, 2025).

² Notice at ¶ 1.

³ These comments should not be construed as binding on the Pa. PUC in any matter pending before it. Moreover, the Pa. PUC’s position set forth in these comments could change in response to later events, including *ex parte* filings, the review of other filed comments, and legal proceedings or other regulatory developments at the state or federal level.

BACKGROUND

On May 24, 1990, the Pa. PUC voted to approve implementation of a TRS system for the deaf, hearing and/or speech impaired within the Commonwealth of Pennsylvania.⁴ Currently, the Pennsylvania TRS service provider is Hamilton Relay.

The Pa. PUC *TRS Order* established a TRS Fund to cover the total cost of the TRS system (Pa. TRS Fund). The Pa. PUC directed that the Pa. TRS Fund would be funded through a monthly end-user billing surcharge (TRS Surcharge) collected by Pennsylvania local exchange carriers (LECs) and revenues received from Incumbent Local Exchange Carriers (ILEC) and Competitive Local Exchange Carriers (CLEC). In order to ensure adequate funding for the Pa. TRS Fund, the Pa. PUC *TRS Order* established a process by which the Pa. PUC calculates and revises the TRS Surcharge, annually, with the authority to make revisions more frequently, as warranted. The TRS Surcharge per access line per month is calculated using the following formula: TRS Annual Operating Cost/Total Access Lines x 1/12.

The Pa. PUC *TRS Order* also established a Relay Service Advisory Board (TRS Board), comprised of representatives from the Pa. PUC, the relay service provider, the Pennsylvania Telephone Association, the Pennsylvania Office for the Deaf and Hearing Impaired, and representatives from the hearing and speech impaired community, to advise on matters such as operator training, problem solving, and future enhancements of

⁴ *Petition of the Pennsylvania Telephone Association Requesting the Commission to Approve Implementation of Pennsylvania Relay Service for the Deaf, Hearing and/or Speech Impaired Community within the Commonwealth of Pennsylvania*, Docket No. M-900239 (Opinion and Order entered May 29, 1990) (Pa. PUC *TRS Order*).

the relay service system. Administrative costs of the TRS Board are also paid out of the TRS Fund.

COMMENTS

I. Terminating Mandatory State TTY Relay Programs Will Have A Significant Impact On Disabled Pennsylvanians

In the Notice, the FCC proposes “terminating the mandatory status of TTY Relay for state-based TRS programs,” which is currently required under 47 CFR § 64.603(a).⁵ The FCC notes that intrastate usage of TTY Relay has declined to fewer than 2 million minutes annually, with some jurisdictions reporting fewer than 1,000 TTY Relay minutes annually.⁶ The FCC attributes this decline to users moving from TTY Relay towards Internet-based TRS solutions, such as Internet Protocol Relay (IP Relay), Video Relay Service (VRS), and Internet Protocol Captioned Telephone Service (IP CTS).⁷

A. There Is Still Significant Demand For TRS Service In Pennsylvania

Similar to nationwide trends, Pennsylvania TTY Relay usage has substantially declined in the past decade. While there has been a significant reduction of TRS usage minutes from 2020-2025, TRS service in Pennsylvania in 2025 alone still accounts for over 6.7% of TRS usage annually nationwide.⁸ As such, while some jurisdictions may experience almost no TRS usage, it is evident that many disabled Pennsylvanians still rely on these services.

⁵ Notice at ¶ 21.

⁶ Notice at ¶ 20.

⁷ *Id.*

⁸ Based on the 2 million minutes of nationwide TTY usage described by the FCC in the Notice at ¶ 20.

There has also been a steep decline of Captioned Telephone Relay Service (CTRS) usage minutes from 2020-2025. Much of this decline is attributable to the large increase in users during the COVID-19 pandemic who now no longer require CTRS, and the increasing availability of non-CTRS mass market technology that serves these users' needs (such as text messaging). We note that while the FCC has mandated the availability of state-run TRS programs, it has not mandated state-run CTRS programs. As such, Pennsylvania's CTRS program is a discretionary one. Nevertheless, as it is funded by the TRS Surcharge and the TRS Fund, changes to the mandatory status of TRS will inevitably impact its viability.

The Pa. PUC acknowledges that if these declining usage trends continue and the balance in the Pennsylvania TRS Fund are depleted, it may no longer be financially viable for Pennsylvania to continue to operate its traditional TRS and CTRS programs. Nevertheless, given the significant number of TRS and CTRS user minutes still being reported, the Pa. PUC does not support the FCC's proposal to terminate the requirement for state-run TTY Relay programs at this time.

B. If The FCC Decides To Terminate Mandatory State TTY Relay Programs, Then It Should Provide Clear Guidance For Sunsetting States' TTY Relay Programs

Should the FCC decide to terminate the mandatory status of state TTY Relay programs, the Pa. PUC requests that the FCC provide sufficient direction to states so that an orderly, consistent sunsetting of states' TTY Relay programs may take place.

1. The FCC Should Make The Mandatory Status Of Each State's TTY Program Contingent On A Threshold Level Of TRS Usage

Pursuant to Title IV of the Americans with Disabilities Act of 1990 (ADA),⁹ which added section 225 to the Communications Act of 1934, as amended (the Act),¹⁰ all states are required to have a TTY-based TRS program. Should this mandate be eliminated, state legislatures could move to terminate funding and discontinue administration of these programs. This scenario would place vulnerable individuals who rely on TTY-based TRS relay service at the mercy of political decisions at the state level.

To avoid politicization of state TRS programs, the Pa. PUC proposes that, rather than establishing a hard deadline for terminating the mandatory status of all states' TTY Relay programs, the FCC should take into consideration the varying usage profiles of the respective states. For example, the FCC could make terminating a state's mandatory TTY Relay status contingent on statewide usage falling below a certain threshold of annual usage minutes.¹¹ Such a proposal would strike a balance wherein states which still have substantial demand for TTY-based relay must maintain their programs, while states with low TTY-based TRS relay usage may wind down and terminate their programs.

⁹ 42 U.S.C. § 12101 et seq.

¹⁰ 47 U.S.C. § 225.

¹¹ As previously noted, Pennsylvania accounts for a significant percentage of nationwide TRS usage minutes, and is therefore at disproportionate risk of being impacted by termination of a mandatory state TTY program.

2. The FCC Should Provide Guidance On How States Transition From TTY-Based Relay to IP-Based Relay

The Pa. PUC observes that TRS users in Pennsylvania are mainly elderly. Accordingly, any plans to eliminate analog and move to digital IP-based TRS will need to incorporate a comprehensive transition plan. Such a transition plan would need to inform legacy users about the need to find new ways to communicate by telephone, publicize the timelines for changes, and provide outreach and training about how to obtain, pay for, and use new devices and services. Such an awareness campaign should be multi-pronged via many channels including direct mail, print and other media, and through relationships with trusted disability and aging organizations.

As such, the Pa. PUC recommends that the FCC provide a lengthy transition period of 5-7 years for states to wind down and ultimately sunset their TTY Relay programs. This will allow for state TTY Relay programs to work with the FCC and relay service providers to identify and assist existing and prospective TRS program users with transitioning to alternatives and avoiding service interruption.

II. The FCC Should Consider The Impacts On TRS Users Having To Switch From Landline To Internet-based Relay Service

The Pa. PUC notes that there remains a cohort of Pennsylvanians with disabilities who still rely on TTYs or other analog devices for communication access. As TTY Relay programs are currently based on landline telephone connections, any cessation of state TTY Relay programs would impose burdens on TRS users to enable their continued access to TRS service. In particular, the Pa. PUC is concerned about the geographic

limitations and financial barriers that some TRS users may encounter when transitioning from landline to internet-based relay service.

A. Some TRS Users Live In Areas With Limited Or No Broadband¹² Internet Access

TTY Relay via landline may be the only option available to some TRS users. For TRS users who live in remote rural areas where broadband internet service is not available or where wireless signals are weak, existing landline connections may be their only viable option for connecting to TRS service. Therefore, if, pursuant to any FCC decision to terminate mandatory state TTY Relay programs, Pennsylvania opts to discontinue its state TRS program, TRS users who only have access to landline-based relay may have to decide whether to make significant life-altering decisions, such as relocating from their home, to have access to TRS service.

The Pa. PUC recognizes that the federal Broadband Equity, Access, and Deployment (BEAD) program, which is administered in Pennsylvania by the Pennsylvania Broadband Development Authority (PBDA), is intended to facilitate broadband deployment in rural areas. However, as of the date of this filing, PBDA's \$790 million BEAD final proposal is still under review by the National Telecommunications and Information Administration (NTIA). Only when the proposal is approved will construction of new broadband networks in Pennsylvania begin. Notably, the selection process and criteria by which rural broadband projects were selected by

¹² The Pennsylvania Public Utility Code defines "broadband" as a "communication channel using any technology and having a bandwidth equal to or greater than 1.544 megabits per second (Mbps) in the downstream direction and equal to or greater than 128 kilobits per second (Kbps) in the upstream direction." 66 Pa.C.S. § 3012 (relating to definitions).

PBDA for its final proposal indicates that some rural areas of Pennsylvania currently have no or limited access to broadband Internet service.

B. Transitioning From Landline To Internet-based Relay Service Will Create Costs For TRS Users

In order to use Internet-based relay services, TRS users who have relied upon landline-based TRS devices will have to purchase equipment that operates through an internet connection in order to maintain access to relay service. Although Pennsylvania does have a state-run program for income-qualifying individuals to be provided with TRS devices free of charge (see Section III.A, below), individuals who do not meet the qualifying income level will have to pay for these new devices out of their own pockets.

Given the likely financial impacts of transitioning from TTY to IP-based relay services, the Pa. PUC supports any federal programs that would provide subsidies to assist relay users who will have to pay for internet service and purchase IP relay devices to maintain access to relay service.

III. Impacts On Other Pennsylvania Government Accessibility Programs That Are Funded Through The TRS Surcharge

On July 6, 1995, Governor Ridge signed Act 34 of 1995, titled the Universal Telecommunications and Print Media Access Act (UTPMAA), into law, thereby establishing the Telecommunication Device Distribution Program (TDDP) and the Print Media Access System Program (PMAS).¹³ The TDDP and PMAS were designed to provide services to persons who are deaf or hard of hearing, are blind or have low vision,

¹³ 35 P.S. §§ 6701.1, et seq.

have speech and language disorders, or have a physical disability that prevents them from using standard telecommunication equipment.¹⁴ The UTPMAA provides that the TDDP shall be funded by the TRS Surcharge and that the PMAS Program may be funded by the TRS Surcharge.¹⁵ The UTPMAA also requires that the Pa. PUC provide an Annual Report to the Pennsylvania General Assembly on the TDDP and PMAS Programs.¹⁷

A. Telecommunication Device Distribution Program

Pursuant to the UTPMAA, the TDDP is administered not by the Pa. PUC, but by the Office of Vocational Rehabilitation (OVR) in the Pennsylvania Department of Labor and Industry (L&I).¹⁸ The TDDP is currently implemented by Pennsylvania's Initiative on Assistive Technology (PIAT),²⁰ now known as TechOWL, a program of the Institute on Disabilities at Temple University, in conjunction with the OVR and the Pa. PUC.

The TDDP distributes and provides telecommunication devices for people with qualifying disabilities under the UTPMAA.²¹ The TDDP provides specialized telecommunications devices, such as text telephones and amplifiers, and wireless devices,

¹⁴ 35 P.S. § 6701.2 (relating to definition of “persons with a disability” or “people with disabilities”). On December 9, 2002, Governor Mark Schweiker signed Act 181 of 2002, which amended the UTPMAA by expanding TDDP-qualifying disabilities to include any disability that prevents a person from using standard telecommunication equipment.

¹⁵ 35 P.S. § 6701.4(c).

¹⁶ Initially, the PMAS Program was funded through special grants; however, beginning in July 2006, it has been funded entirely from the TRS Surcharge.

¹⁷ 35 P.S. § 6701.4(e).

¹⁸ See, 35 P.S. § 6701.3(b).

¹⁹ <https://www.pa.gov/agencies/dli/resources/forms-and-documents/office-of-vocational-rehabilitation>.

²⁰ <https://disabilities.temple.edu/assistive-technology>.

²¹ 35 P.S. § 6701.3a(a). In 2018, the Pa. PUC approved expansion of the TDDP to allow for distribution of wireless devices. *Petition of the Department of Labor & Industry Office of Vocational Rehabilitation for a Proposed Pilot for Distribution of Telecommunications Relay Service Wireless Equipment to People with Disabilities in Pennsylvania*, Docket No. P-2015-2484229 (Opinion and Order adopted December 20, 2018, entered February 27, 2019), At 16.

at no charge to Pennsylvania residents who have a qualified disability, who have gross incomes of less than 200% of the federal poverty level, are at least 6 years old, and have telephone service and possess the ability to learn how to use a telecommunications device.²²

In 2024, the TDDP issued 380 equipment devices, cumulatively worth \$330,861.10 to users in Pennsylvania. These devices were distributed to 355 unique recipients in 59 of 67, or 88% of counties in Pennsylvania.²³

B. Print Media Access System Program

Similarly to the TDDP, the PMAS program (also known as “Newsline”) is administered not by the Pa. PUC but by the OVR in L&I.²⁴ All customers of the OVR’s Bureau of Blindness and Visual Services are offered the opportunity to subscribe to Newsline.

Newsline is a free electronic service that gives any individual who is blind, visually impaired or print disabled access to print media access systems.²⁵ Newsline provides users access to newspapers, magazines and TV listings 24 hours a day, seven days a week using a touch-tone telephone. Newsline allows users to listen to daily newspapers, over the telephone for free, and access up to two weeks of TV listings in advance. Users can choose to have selections sent directly to their email address or to

²² See, 35 P.S. § 6701.3(c).

²³ March 18, 2025 letter from the Office of Vocational Rehabilitation to the Pennsylvania Public Utility Commission concerning TDDP and PMAS 2025-2026 budget information, at Pages 4-5. Included in the 2025 Legislative Report on the TDDP and PMAS. Available online at: https://www.puc.pa.gov/media/3687/trs_combined_legislative_report-2025-b.pdf.

²⁴ 35 P.S. § 6701.3a(b).

²⁵ 35 P.S. § 6701.3a(a).

their iOS devices. Newsline also includes a channel containing job listings in which users can search using their own personal criteria. The Newsline system can also send a subscriber their newspapers via e-mail, and also provide up-to-date weather forecasts.²⁶

Currently, there are 23 newspapers from Pennsylvania in the Newsline system, and Pennsylvania subscribers can also read Associated Press (AP) articles pertaining to their state, which are updated every hour. The AP content is the same information that is sent to television and radio stations throughout the state. Pennsylvania's Newsline subscribers also have access to 43 magazines, as well as several national publications.²⁷

As of June 30, 2025, there were 4,892 subscribers to the Newsline service throughout Pennsylvania. Statistics indicate that a subscriber from Pennsylvania accessed Newsline to obtain a piece of information every 49.2 seconds from June 1, 2024 through June 30, 2025. Newsline operational and distribution fees, along with one-time setup fees for newly-added publications in Pennsylvania, totaled \$193,000 for the period of July 1, 2024 through June 30, 2025.²⁸

As previously noted, the TDDP and PMAS Program are funded by the TRS Surcharge, pursuant to the UTPMAA.²⁹ There are currently no other public or private funding sources for these programs. Therefore, the potential elimination of the TTY

²⁶ <https://www.puc.pa.gov/telecommunications/telecommunications-relay-service/print-media-access-system-program/>.

²⁷ *Id.*

²⁸ NFB-Newsline Annual Report July 2024-June 2025, at Page 3. Included in the 2025 Legislative Report on the TDDP and PMAS. Available online at:

https://www.puc.pa.gov/media/3687/trs_combined_legislative_report-2025-b.pdf.

²⁹ 35 P.S. § 6701.4(c).

Relay program would necessarily affect the Pa. TRS Fund and TRS Surcharge, which in turn would impact funding for TDDP and PMAS.

IV. User Privacy Concerns And Alternatives To Artificial Intelligence-trained Automatic Speech Recognition Technology

In the Notice, the FCC cites to “[d]evelopments in Automatic Speech Recognition (ASR) technology, a form of artificial intelligence [(AI)]” as “holding ‘great promise for a telephone communication experience that may be superior to and more efficient” than Communications Assistant (CA)-assisted (IP CTS).³⁰ The Notice goes on to assert that “ASR-generated captions for IP CTS are approaching, and in some cases exceeding, the accuracy of human-assisted captioning, while offering advantages in speed, privacy, and significantly lower operating costs.”³¹ While the Pa. PUC does not necessarily contest the potential of ASR technology to assist disabled individuals, usage of AI in this context raises questions of informed consent and user privacy. Further, the Pa. PUC notes the existing availability of Speech-to-speech (STS) relay as an alternative relay service that does not implicate data privacy concerns to the extent that ASR does.

A. Relay Users Must Provide Informed Consent To Allowing Their Data To Be Used To Train ASR Technology Used For Relay Purposes

ASR uses a combination of AI and machine learning to convert spoken words into readable text.³² In order to improve performance, ASR necessarily relies on verbal inputs

³⁰ Notice at ¶ 13.

³¹ *Id.*

³² <https://www.netcomlearning.com/blog/automatic-speech-recognition>.

gleaned from successive interactions with users. This raises concerns about user consent and data privacy.

The Pa. PUC notes that many speech disabled individuals are from the aging community, and as such may not be fully informed about whether and how their verbal inputs may be stored and used to train ASR systems. With the goal of protecting vulnerable Pennsylvanians, the Pa. PUC recommends that the FCC require all relay services that incorporate AI-training to (1) make clear and comprehensive notices about their collection, storage, and use of user data for AI-training purposes publicly and freely available on their website and in all promotional materials, and (2) include an automated message notifying users that their conversation may be recorded, stored, and used for AI-training purposes upon initiation of a relay call.

B. Speech-to-Speech Relay Is An Underutilized Alternative To AI Trained ASR Technology

Individuals whose natural speech cannot be understood may use augmentative and alternative communication (AAC) systems. However, some users of AAC systems report “hang ups” when the person answering the call perceives the voice of the speech-generating device to be a “robocall”. By contrast, STS relay is an existing, mandatory available service that is valuable to people with disabilities affecting spoken communication. With STS relay, individuals with speech disabilities that affect intelligibility can be effectively assisted by a communications assistant (CA), a specially trained human person to assist with the call, rather than relying on an automated system which may or may not have the capability of effectively interpreting the user’s speech or

troubleshooting user issues. Further, with STS relay, there is no risk of user data being collected, stored, and used to train AI systems.

The Pa. PUC supports the FCC's proposal to maintain the mandatory status of STS service as part of state TRS programs.³³ Currently, the Pa. PUC funds STS and conducts STS outreach through its state TRS program via the TRS Surcharge and Pa. TRS Fund. The cost of providing STS is calculated as part of the TRS Surcharge, separately from the costs of providing TTY relay, Spanish Relay, and CTRS, respectively. If the FCC ends mandatory state TTY-based TRS programs and Pennsylvania consequently opts to terminate its state TRS program, the state will have to reassess whether it would be financially viable to continue its STS program given current usage levels.

Despite the availability of STS, Pennsylvania accounted for only about 1% of nationwide STS usage in 2025.³⁴ Consistent with the FCC's observations about STS usage nationwide,³⁵ the Chairperson of the Pa. PUC's TRS Board³⁶ has noted that STS remains a relatively unknown and underutilized service in Pennsylvania. The Pa. PUC agrees that STS has the potential to assist more speech-impaired individuals and would consider supporting a centralized, nationwide STS education and outreach program to increase STS participation and STS program viability. However, the Pa. PUC's support

³³ See, Notice at ¶ 54.

³⁴ Based on the 400,000 minutes of nationwide STS usage described by the FCC in the Notice at ¶ 48.

³⁵ Notice at ¶ 61, 63.

³⁶ Amy S. Goldman is the current Chairperson of the TRS Board and Past President for the US Society for Augmentative and Alternative Communication (USSAAC).

would be contingent on how the proposed nationwide outreach program would be funded.

CONCLUSION

For the reasons stated above, the Pa. PUC respectfully requests that the FCC refrain from terminating the mandatory status of TTY Relay at this time.

Respectfully submitted,

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