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| PUC logo | COMMONWEALTH OF PENNSYLVANIA  PENNSYLVANIA PUBLIC UTILITY COMMISSION  P.O. BOX 3265, HARRISBURG, PA 17105-3265 | **IN REPLY PLEASE REFER TO OUR FILE**  **P-2015-2484229** |

March 26, 2019

To: Office of Consumer Advocate

Office of Small Business Advocate

Temple University Institute on Disabilities

Pennsylvania Wireless Association

Broadband Cable Association of Pennsylvania

Re: **Pennsylvania Telephone Relay Service Task Force to Undertake a Comprehensive Review of the Pennsylvania Telecommunications Relay Service and the Associated Telecommunications Device Distribution Program,**

**Docket Nos. P-2015-2484229, M-00900239, and M-2018-2640814**

By Order entered February 27, 2019, at the above-referenced docket numbers (*Task Force Order*), the Pennsylvania Public Utility Commission established the Pennsylvania Telephone Relay Service Task Force (Task Force). The Task Force is responsible for the wholesale review and assessment of the Pennsylvania Telecommunications Relay Service (TRS) Program, the associated Telecommunications Device Distribution Program (TDDP), and other related programs. This letter serves as an invitation to proposed members of the Task Force and schedules the first meeting of the Task Force members.

The *Task Force Order* recognizes that technology has evolved since the establishment of the TRS Program in 1990 and the TDDP in 1995 and that consumers are migrating away from wireline service to mobile telecommunications services. The current trends in technology and consumer choice present both challenges and opportunities for the Commission in its task to design and implement a viable and sustainable Pennsylvania TRS program and fund as required by state and federal law. In order to conduct a comprehensive review and assessment, the Commission seeks to draw on the expertise of a variety of stakeholders. Consequently, the *Task Force Order* proposes that the membership of the Task Force, at a minimum, include the following organizations or individuals:

* The Pennsylvania TRS Advisory Board (including representatives from the Pennsylvania Telephone Association and the relay services provider)
* The Office of Consumer Advocate (OCA)
* The Office of Small Business Advocate (OSBA)
* The Temple University Institute on Disabilities
* Two members with disabilities designated by the TRS Advisory Board (with one member from the disabled veteran’s community, if possible)
* A member of the Pennsylvania wireless industry
* A member of the Pennsylvania cable industry

In its review, the Task Force is required to seek input from other interested stakeholders including, but not limited to, TRS and TDDP participants, consultants, administrators, other agencies, and representatives from industry and technology groups. The requested input from the stakeholders shall pertain to changes in technology, trends in declining landlines and alternatives to the current surcharge structure, consumer choices and trends, demographic changes, and ways to leverage readily available technology like smart phones, tablets, and the Internet.

After gathering the relevant input and conducting the comprehensive assessment, the Task Force must prepare and file a final recommendation. Each member of the Task Force will have the right to participate as a full member and be entitled to vote on any final recommendation or position of the Task Force. Members serving on the Task Force will be expected to attend or send appropriate representatives to monthly meetings of the Task Force, or any additional meetings scheduled by the Task Force, until the completion of the final recommendation. As discussed below, members of the Task Force will be reimbursed for any reasonable travel and overnight stay costs related to their participation on the Task Force.

Through this letter, the Commission invites the OCA, the OSBA, and the Temple University Institute on Disabilities to participate as members of the Task Force. Additionally, the Commission invites at least one representative each from the cable industry and the wireless industry to participate. Representatives of the OCA, the OSBA, Temple University Institute on Disabilities, and representatives of the cable and wireless industry should contact Erin Laudenslager, Bureau of Technical Utility Services, (717) 705-4364, or email at [elaudensla@pa.gov](mailto:elaudensla@pa.gov), by April 12, 2019, about participating on the Task Force.

The *Task Force Order* directs that the TRS Advisory Board members be included as members of the Task Force who shall prepare the final recommendation for the Commission and whose input shall be coordinated with the current chair of the Advisory Board with assistance from other members as necessary. Additionally, the Commission requests that the TRS Advisory Board recommend two members with disabilities who have experience utilizing relay and/or TDDP services. In order to facilitate the invitation, the Chair of the TRS Advisory Board in consultation with the TRS Advisory Board shall have the discretion to invite the proposed Task Force members who will represent the individuals with disabilities.

In addition, the Chair of the TRS Advisory Board shall call a Special Meeting of the Advisory Board for the purpose of convening the Task Force, which is scheduled for **Friday, April 26, 2019**, at the Commission’s offices in Harrisburg. A final recommendation is due to be filed with the Commission within nine months of the *Task Force Order* (*i.e.*, on or before November 27, 2019).

The Commission notes that the payment of reasonable expenses related to the logistics of sponsoring and holding the Task Force meetings, including the reimbursement of travel expenses for Task Force members, which are paid from the surcharges collected through the TRS Program, is permissible under the Universal Telecommunications and Print Media Access Act, 35 P.S. §§ 6701.1, *et seq*. (UTPMAA). Section 6701.4(c) of UTPMAA prohibits payments for “administrative costs” of the TRS Program, the TDDP, or the Print Media Access system program. However, the payment or reimbursement of reasonable costs pertaining to the Task Force meetings are authorized because they are not related to or expended for administrative costs of the Commission, which are addressed through the Commission’s routine operational budget. Expense reimbursement will be subject to limitations applicable to state employee travel.

To the extent the Task Force on a consensus basis agrees to consult with a subject-matter expert, the expert may be reimbursed for standard travel expenses only – and not for consultation, appearance, presentation, or similar services. Reimbursement above standard travel expenses requires separate justification and must receive ***prior Commission approval***. To the extent that industry groups or associations will utilize their own subject matter experts during Task Force meetings, they are expected to cover any associated travel costs. The use of teleconferencing and/or videoconferencing with subject matter experts is strongly encouraged. The Commission shall maintain an expense and reimbursement log for the Task Force activities that is separate from the expenses and reimbursements for routine TRS Advisory Board matters.

Should you have any questions regarding this Secretarial Letter, please contact Erin Laudenslager, Bureau of Technical Utility Services, (717) 705-4364, or email at [elaudensla@pa.gov](mailto:elaudensla@pa.gov).

Very truly yours,

Rosemary Chiavetta

Secretary

cc: Pennsylvania Telephone Relay Service Advisory Board Members

Erin Laudenslager, TUS