June 23, 2015

VIA ECFS

Ms. Marlene Dortch, Secretary  
Federal Communications Commission  
445 12th Street, S.W.  
Washington, DC 20554

Re: Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities, CG Docket No. 03-123; CG Docket No. 10-51

Dear Ms. Dortch:

Convo Communications, LLC (“Convo”) has hosted several Open Chats to help raise awareness among consumers about issues impacting Video Relay Service (“VRS”). On June 19, 2015, Convo hosted an Open Chat on the “New Personal Information Requirements to use VRS.” The panelists were Commission personnel Gregory Hlibok, Chief, Disability Rights Office, David Schmidt, TRS Fund Program Administrator, Office of Managing Director, Alok Doshi, Office of Strategic Planning & Policy Analysis, and Sheri Farinha, Representative of the California Coalition of Agencies Serving the Deaf and Hard of Hearing.

The captioned video may be viewed at: https://www.youtube.com/watch?v=rWgzAkiA08E

The attached transcript of the video, which was not reviewed or edited by the participants, is being filed to the Commission dockets given the joint petition of all six VRS providers for a temporary waiver of the social security number rule and petition for rulemaking.

We appreciate the Commission’s commitment to progressing the VRS program to achieve equal telecommunications access goals while protecting the integrity of the program.

Sincerely,

/s/

Jeff Rosen  
General Counsel

cc:   Maria Kirby  
    Jonathan Chambers  
    Karen Peltz-Strauss  
    Gregory Hlibok  
    David Schmidt  
    Alok Doshi  
    Sheri Farinha

Attachment
Open Chat: New Personal Information Requirements to use VRS Transcript

Jeff Rosen: Greetings, I’m Jeff Rosen. I am the General Counsel for Convo Relay. Convo as a Deaf operated and owned company, feel strongly in supporting knowledge in consumers about the impact of using VRS. Today’s Open Chat will focus on the new personal information registration requirements to use VRS. Now I will introduce our panelists. First up, we have Greg Hlibok, he is the Chief of Disability Rights office. Second, we have David Schmidt, he is the TRS Program Coordinator at the Office of Management and Direction. Third, we have Alok Doshi. He is with the Office of Strategies Program. And the fourth, our interpreter for today. Now, we have some questions for our panelists to get started with as usual then we will open it up to the audience for your questions. How can you ask questions? Join us during the open chat via Facebook, Twitter, or VP! How? Type in convorelay.com/openchat in your browser. At the bottom, you will be able to post a question to Facebook or Twitter. Use the #OpenChatConvo! You can call in to (855) 245-0124 and record a message. (Pre-recorded videos only.) Jeff: In 2013, FCC established a new system called TRS User Registration Database (URD). It also contracts with the fund administration to run the URD, expected by September 2015. The new information that is required for all customer to give are the last four digits of your Social Security number and your date of birth. If you don't have a SSN and live on a tribal land, you can use your tribal ID number. FCC recently ordered a waiver for those who don't have a SSN. They can provide documentation from a list of approved documentations to verify who you are, and you can register in the URD. VRS providers won't be compensated if the users are not registered in the URD by a deadline, that hasn't been set yet. Deaf consumer advocates and organizations has expressed concerns to the FCC that the collection of SSN and personal information could cause issues with privacy, the sensitive information could be subject to identify theft, and also, it could cause problems for undocumented people, immigrants. It seems not to be functioning equally. So, consumer groups have been in contact with FCC and asked them if they could not gather that kind of information. VRS providers did the same, they filed a petition for a waiver for the collection of that information, the information of SSN and DOB are not necessary to prevent frauds. Why? We use ASL, we can identify who you are. So, today we will discuss FCC's perspective on why information should be gathered, and what the process would look like along with the timeline. Also, I mentioned we'll start with questions then open it up to you. The first question we have for the panelists is the current VRS registration works fine, why do we have to provide our SSN and DOB now especially when hearing people don't have to provide that information for their phone lines? That is our first question, who would like to answer it first? David, can we start with you? David: Okay, it sounds like the question is about the policy decisions, I'll make a comment then turn it over to Greg but anyways, the FCC passed, like you recently explained, in 2013 an extensive report on why the new information would be required I can't explain everything to you from off the top of my head, but you can read it. Like Jeff said, there were requests made to FCC asking for changes to that requirement. But that process hasn't happened yet, but until that happens this is a requirement. If you're concerned about the last four digits of your SSN, the way we plan to set the system up will not save your information. Once we verify your information, that information is thrown out. We do not keep this information in a list where it could be susceptible. I am referring to the URD; no information will be stored there. I cannot speak for the providers retaining the information,
however. Jeff: Ok, thank you David, any other additional comments? Greg: Greg: Sure, thank you Jeff. Like David said, the registration database is a part of a reprogram 2013 VRS order. It comes with various changes. The first is registration, a reference platform to verify and to determine accommodations to test standards along with many other changes. So with that grouped, considering that research is needed for the public to have confidence in the system... The system needs to be robust and solid. So, with that, the SSN is a part of the normal business out there. When businesses out there want to verify, they tend to request the last four digits of SSN to verify that you are who you claim to be. That is a typical common practice out there, so we used this model and applied it. We’re not trying to make things harder for people; it’s just the same model. Now, with the SSN requirements, the perception on whether it is useful or not has changed over the years. It's evolving because of some databases have been compromised by hackers and we recognize that. We know that, we all know that. But we promise to secure that information. We have a petition in place asking us to take another look at the requirement. Today, it still stands and we're looking and considering it. Jeff: That helps, thank you Greg and David. I'd like to move to the next question. The question is... If a VRS consumer rejects to provide their information, can they do that? If they refuse, what are the consequences under the current written rule? I'll ask Greg, we can start with Greg. Greg: Sure. Few of us did express our resistance and concerns about having to provide last four digits. But we referred them to our ASL customer support line to explain the reason behind that, like David explained, we use the information ONLY to verify your identity then it is thrown out. After we’ve explained that, the Deaf user is accepting of the reasoning--but if the resistance continues, we work with the user to find a solution but we don't have an answer right now, we have the petition out and standing right now that needs to be looked at but we can't promise anything. Jeff: Understandable, the reason why we're having this chat so the people are ready to understand their providers contacting them for that information because by September, we need to be sure to be ready by then. Some providers have 10, 20, 30, 40, 80 thousand or 100 thousand consumers. That's a lot of people to go through, so we can't wait until that point in time. So we have already started contacted some, we already have had some discussions at this point, so we can understand that could evolve and change, that's good we're able to have an open discussion so our consumers can still give feedback and revisions from their perspective, that's good. The third question is about the undocumented immigrants, they don't usually have the documents that matches the alternative requirement documents to be verified, what will be done about that? We know FCC has issued a waiver on that two months ago, but it has continued to be an issue for those who are undocumented, so, any perspective on that? Any one would like to comment? Greg. Greg: Sure. For undocumented residents or undocumented individuals, they face the same issues for any other services that they want to receive in the U.S. If they have none, in our waiver order, we list 13 alternative documents to show, such as driver’s license, utility bill with residence address, etc., so we see a lot of options. If they couldn’t even come up with one, that’s really an issue larger than us. It’s not about TRS, it’s a bigger issue which is more about the situation of being here in the U.S. without any documentations. It’s not about the person being Deaf or Hard of Hearing; it’s about them being here with no documentations at all. If that happens, then it needs to be addressed in different ways through a discussion or waiver, but that’s really a larger issue. Jeff: I understand your perspective. Most people do have the documentation as an immigrant, but a lot of people are here illegally or because of their children therefore their documentations are still not cleared yet because many people still have ongoing issues with struggling to get the right documentations. So, that's why I asked if
that issues arises. Now we're going to turn it over to our audience for their questions. The first question is... [Facebook comment on screen] Mike Keathley: I'm trying to understand what the problem is? Is Convo saying they do not want the added responsibility of protecting other's private information? I mean, I had to submit my full SSN to obtain cellular services as well as a landline. The same goes for basic utilities for one's home. Jeff: Okay, that's an interesting question, we'll ask Sheri that. This user is asking what the big deal is...that kind of information is used widely for cellular services and utility, so why is it an issue? I'll ask Sheri from a consumer perspective to what could be the issue and the difference? Sheri Farinha: Sure, thank you. First of all, California coordinates 8 sister Deaf associations providing services on a daily basis, users come in for various reasons. Often still today, we see users like last night again complaining "Well, VRS providers are asking for my Social Security number, why?" People feel like they don't want to give their personal information; it's their privacy. It feels like a violation of their privacy rights. I had to explain that it's not the VRS providers that require this information, but the FCC. Still, they don't want to give that number. The reason for this resistance is fear of identity theft. And the Social Security Administration itself is for undocumented individuals who are not required to provide that information. Obviously, they don't have to, but need to also look at the perspective of the person having to tell you they don't have a SSN. That violates all of my privacy rights too because now people know I'm undocumented. Understand me? So that itself violates our civil rights regarding those who we are as individuals. Recently, the situation with the Feds' database being hacked by China, right? Last Friday. That is even more of a reason to be scared. All of the information; personal information, job information, job history plus SSNs in that federal database for all of the federal employees, now hackers can go into more employees' information and hack into them. Is it a good idea to store your personal information in one place? Plus, not only that, people wonder about purchasing things, you use your credit card and your SSN understanding that we're purchasing this to use to our credit history to show how good we are, yes we're not buying service from you, FCC, so we shouldn't be providing that kind of information. One thing that I wanted to bring up to FCC last year was because we've already purchased our phones, for example, my iPhone through AT&T, I bought that. That information, they already had my SSN. That's who should be verifying us as individuals. Again, the violation of our civil rights is when you only ask Deaf people for that information. You don't ask hearing callers for their SSN, if not, then that's not equality. Jeff: Thank you Sheri. I want to know if the panelists have any response to that. Greg: I would like to continue to clarify that the SSN will not be stored in a database. It will only be used for verification through a third party verification agency. They will use it to match names, then the SSN will be removed. It will not be put in a database. Databases are centered. The central database was a proposed idea...and the consumers have been pushing for this for many years before we adopted that requirement. So really, the concept of centralized database didn't come from us but from consumers' proposal central for more efficiency, easier than right now separating each. Some providers don't do a good job of verifying themselves, so we'll be able to centralize it and this will be used for other purposes such as IP Relay. As you know, IP Relay is subject to fraud too. It is possible to include IP CTS along with other services. So the centralized database will serve different purposes. Like I said, this is evolving. We recognize issues as they arise such as hacking. We're adapting, it's not set in stone. Sheri: Can I respond? Thank you for that, Greg. One thing you mentioned...Also our phone numbers...I mean SSN will travel from a point A to point B to point C. If a VRS provider asks me for my SSN and they receive it, and they give it to a third
party. Right? To give to FCC. Greg: To verify. Yes. Sheri: To verify. That transfer of information doesn't stay between us, that's a big difference too. So, how do you deal with that human factor of possibly, who knows, operators are human beings too. So, what if they write down the information and keep it? Many different reasons why Deaf and Hard of Hearing people are afraid of giving out their SSN. Jeff: Thank you, we'll turn to David. David: Ok, hello Sheri. I understand your concerns, hello everyone! Let me explain what it would look like to the users. Remember, there are two separate procedures, right now each VRS provider has their own database. We will have to migrate all of that information to one place, that procedure starts in September. When all of that is done, in November all the information will go straight to that centralized database. Users will be submitting directly to the database. I don't know how or who will run the database. I'm not sure exactly how that will be set up, but possibly it will be on a website designed for the VRS provider. It will look like your normal website but it feeds to URD. Then the URD will go to verification. That information does not go to the VRS providers. Except for what is needed will be filed. SSN is not one of them. It goes straight to the URD. When it is checked, it is deleted. Like Greg said, it is FAST. It will match names, there is no save button. Even if you don't get verified or you fail, your SSN is still deleted. First check or not, regardless of pass or fail, it will be deleted. We have many protocols to follow, I lost my thought there. It is required for a TRS fund manager to follow FISMA compliance. It is Federal Information Security Management FISMA, you have to pass a level to be sure of what you're doing. Second, we set up SOR, System of Records, it's a formal setting. I can't tell you all of the security protocols. But those are some of the system settings we have. We want to protect your information. I understand your sensitiveness. Trust us, we take responsibility for the protection of your information. Our system is designed to securely protect and hopefully no one will have any type of situation that will freeze us. That's the best you can do with ANY computer system set. They're all the same. I don't mean to tell you it's impossible but it is truly difficult--the percentage is small. We're doing everything we can to prevent any violations to happen. Jeff: True. Let's turn to Alok. Alok: Hello everyone. My field is operations marketing technology. I'll provide that perspective. Like Greg said with the petition that was looked at for legal decisions, but with the federal government... Before I joined the FCC, I worked with the Department of Health Services, CMS center for Medicaid and Medicare services. For Medicare, you have to fill out a form to receive services from the government, the government needs to verify that you are a United States citizen. You give them your SSN. They verify it through a computer system too. Also, I worked on HealthCare.gov, are you familiar with it? It's three years old with the Affordable Care Act. It's on the website, you have to type your SSN there. They get a tax discount if you have a low income you get a discount, you have to enter your SSN. How does it get sent? It goes to Home Security Database and IRS. Immediate verification. It will send to get verification then back to you and say "yes, verified". Then you move along. That's the same principle that David was talking about. It's the same concept. I'm just speaking from the operations technology perception. Jeff: Thank you. We will be moving on to the next question. It's good to hear all of this from the panelists. It's helpful to see the high levels of thought and security built in the system. So it happens I've had my information violated very recently, three days ago, from OPM, they told me my private information was broken into. That's my personal impact. Aside from that, I think Sheri makes a good point that I want to briefly touch on then will move on. First of all, supposedly you want to use your SSN for registration for various services like telephone products or services, they all do have alternatives if you don't want them to know in
public you can provide other information rather than your SSN, it's possible. We've heard many times that you HAVE to provide your SSN but it is very much true that there are alternatives. That was Sheri's point that many of us struggle with, and that is Deaf people have to provide SSN but a hearing person that participates would not have to. If a hearing person calls me and they don't have to provide their SSN. Many people feel conflicted about that. That's what we're arguing, about who doesn't have a contractual relationship with providers but with VRS it is different, there is no contractual relationship. We have VRS providers as your default provider, period. The question of contractual relationship doesn't really exist here or with FCC either, because FCC manages the funds, who pays for this? Not FCC. It is really the consumers paying for it through phone bills, so that's why there's a lot of concerns and questions. Okay, we can go on to the next question, please. [Facebook comment on screen] Sharon Hayes: If the FCC indicates that this is the purpose of preventing fraud... it's happened long ago. There are more frauds committed by others that we are a minute part of the problem. Do not make the deaf/hh community scapegoat of the problems created by some other companies. Should there are other ways to request proof of ID other than using our SSN. WE have enough problem as it being deaf/hh. Jeff: Good question, I would like to summarize it. It's a part of my original question... Registration works fine, I understand you want a centralized database, that's cool. But new information wants to be gathered, a lot of uncertainty why that is appearing--there is no fraud involved with identities. Because we use ASL to use VRS, that's where the question is, if there's no fraud, what is the purpose of this? It has been vague. We understand the centralized database, but the purpose of the SSN is still vague. Now, I'd like to turn it to the panelists, again this is still under observation. Your thoughts and discussions will still make an impact, it's what the rules addresses, so who's the first person to make a comment about registration therefore no need for SSN to prevent frauds. Who will go? Greg: I'll answer. Well... No activity doesn't mean we should relax. The same thing with terrorism security, if there's nothing going on, we can relax. It's not a question of responsiveness to frauds, it's to establish a solid system. It happens all around us, with consumers, with industry providers, who contributes to fundings. Have confidence in the system. So, the SSN requirement is one way of guaranteeing that the system is working properly. Verified. We don't expect to build up the burden so, it is provided to verify. Again, two things, we have a petition asking us to take a second look and we are now looking at it. The consumers that are resistant about the SSN last four digits. Please reach out to us through the ASL customer support line, we're happy to explain. Our Deaf representatives will explain it so you can understand the reason behind that. It is still revising, again, if nothing's happening, it doesn't mean we relax. That's not a good argument. Jeff: David. David: Well, Greg explained it perfectly. I wanted to add more with my perspective. Before I joined the FCC, I worked with this type of information. There are five things we ask about you, and that is the minimum. Without that, we don't trust who you are. You could be another person for all we know, I want to know five things about you before we know it helps us. Like Sheri said earlier with credit card information, that is more trustworthy but we don't ask that of you. The FCC is trying to figure out our minimum, we're not asking for your full SSN. The last four of your SSN is sufficient, and it will be thrown out. That's the most simplest we can do. Anything less, we can't trust. To have trust, we need to know a couple of things about you. We can trust that you're not another person. Without this, it will be worthless and impossible to decipher who you are. If you want extra trust, you will have to provide more information. The FCC is very careful about looking at the minimum of information we need. It's not to add a burden on the Deaf/HoH community. We're taking on the
responsibility of being careful of our funds being spent accordingly. That's what Greg just said. 
Jeff: Thank you. Alok. Alok: I'll keep it brief. You say it happens to Deaf people, but it happens for hearing people. Medicare just caught several frauds by patients and doctors, there are various federal agencies that oversee this. So with that and what they said, we're trying the best and the most minimum we can do to prevent that. What Greg said was right, it's better to be proactive, if you have a better idea, send it to us. Let us know how we can operate it better. 
David: Greg, let me know if I'm wrong, but in the list of alternatives if you don't have a SSN, that's called a Lifeline program, this is generally used for everyone, including hearing people. We don't want you to feel like we're picking on Deaf people, it's the same procedure for everyone. We're making sure we're not targeting Deaf people. Jeff: Thank you, David. You have a few comments Sheri so go ahead. Sheri: Thank you, I appreciate that information Dave, Greg, and Alok. I still want to emphasize that when you just ask for a SSN number, even if it’s just the last four digits and the person doesn’t have one, it puts them in an uncomfortable situation. We reveal ourselves and it’s not documented, and that’s not legal here. So there’s that legal perspective, we’re not allowed to ask people if they’re legal here in California. Again, don’t ask for ASL. I mean... From a hearing person calling a VRS, it involves both a hearing and deaf person so with the 21st century act there are both hearing and deaf people using it so therefore you should be asking a hearing person for their SSN number too? It would only be fair. Again, my solution would be to have everyone pay for their phone bill or dish, or cable, or whatever, that should be used as an example of my accommodation and tell them who my provider is. They could just contact my provider as a way to verify who I am that way. Jeff: Okay, thank you Sheri. I want to sum up a couple of things. One is that we still have issues on how to verify people using numbers in public places like libraries, schools, universities, we still have issues about how to verify phones used by minors too. We still have that question about if you refuse to give out your SSN or make one up, we have to proceed with that because those waived from this are only for those who do not have SSN numbers. This is just to be clear, this is for those who do not have SSN numbers, not for those who don’t want to give out this information. This is where we still have work and progress, but so far we’ve had some collaboration with the FCC and the fund manager who handles URD, we have had a discussion on these issues and have some possible solution. For example, users can use something called an experian personal ID or a lexington number so that way we can target a specific person. So we’ve discussed that. The last one I want to point out is the understanding we need to make this secure. This is really controversial for Deaf people, VRS has gone through a lot with fraud and Deaf people have been impacted. So somebody has broke it, someone will fix it. So far the FCC has been trying hard to fix it, other people too. But the fraud was caused by bad providers, not from people but that’s where people are struggling to understand it all. We’ll take a few more questions before we close this off so go ahead with the question please. 
[Facebook comment on screen] Wendy Serier Mentor: Why do FCC require personal information? Jeff: Okay, why does the FCC require personal information? Like Dave said starting in 2013, the VRS reform ordered for all consumer information to be placed in one centralized database. That’s where we still have work and progress, but so far we’ve had some collaboration with the FCC and the fund manager who handles URD, we have had a discussion on these issues and have some possible solution. For example, users can use something called an experian personal ID or a lexington number so that way we can target a specific person. So we’ve discussed that. The last one I want to point out is the understanding we need to make this secure. This is really controversial for Deaf people, VRS has gone through a lot with fraud and Deaf people have been impacted. So somebody has broke it, someone will fix it. So far the FCC has been trying hard to fix it, other people too. But the fraud was caused by bad providers, not from people but that’s where people are struggling to understand it all. We’ll take a few more questions before we close this off so go ahead with the question please. 
[Facebook Comment on screen] Ebony Gooden: Do you mean we have to give that information each time to use vas or is it a one time thing in
beginning? Jeff: I’ll have Dave answer that question. Dave: The simple answer is you give your information once. When the registration process is complete, you are in the database and that’s all we need. You don’t have to worry about it after that. We are now doing a study to decide if we want to apply the same system for IP Relay, IP CTT Captioning, and whether that information could be transferred to other services. We’re also thinking of several different providers and how this information could be applied to other phone numbers with different providers. However, the big picture is that you will only need to give your information for a one-time verification process.

Jeff: Thank you, David. I think that covers the question. Next question please.

Caller on screen: Hello, I know some numbers do not belong to one person, like a business phone number or some government agency, a call center which has several different people answering the phone with that same number, how does this work? One SSN for everyone who uses that number or is it just for one person or are they waived for that particular reason? Thank you.

Jeff: Good question! For example, suppose you go to a friend’s home and use their VP, how does this work? Do I have to give them that information, register, and in a public place? We want VPs released to replace old school TTYs, but those are still important, we know there are some people who can’t sign or speak, so they still can use TTYs. We will conserve that, but I want to see more VPs being used all over so how do we figure that out? We’ll ask Greg this. Greg: Thank you. Really, this is another current pending issue. We’re inspecting how FCC should handle the kinds of videophones installed for public use. We’re working with a few providers and starting a dialogue to solve some issues with the database. Really, going back to delegating numbers, those numbers are only for Deaf and Hard of Hearing people. Some providers interpret that rule as only giving out numbers to individuals, and not applying that to public entities like setting up VPs in airports or libraries since it doesn’t involve providing and setting this up for an individual. We are providing them with VPs anyways and getting that set up, and having the owner or head of facilities sign a certificate that they monitor and ensure that those VPs are being used by Deaf/Hard of Hearing people, so it’s a different transit involving different providers. The bottom line is that we will have this solved before setting up rules.

Jeff: Wonderful, so that’s been answered. We’re going to go ahead with the next question.

Caller on screen: Is the FCC really going against ADA laws? ADA’s laws has a clause that says if the public doesn’t need a phone number or a certain something, then people with disabilities should have the same applied to them, they don’t need to provide more details because they’re disabled. So is this something that the FCC has considered and put into thought to overcome that ADA law, requiring disabled people to provide more information when the public doesn’t have to? Jeff: Thank you for your question, at the beginning of the webcast, the consumer organization did reach out to FCC explaining their list of concerns about using that information and focusing on their functional level. There are two parts: One is that ADA doesn’t require our SSN if you’re Deaf, Hard of Hearing, speech disabled but understand that power from the FCC is to implement a program so legally it is possible. The second thing is that, like Sheri pointed out earlier, it’s interesting, if I’m Deaf I have to give out my SSN to be able to use VRS but when a hearing person calls, they don’t have to give out their SSN. Rhetorically they could give out their SSNs for calls, this could be hypothetical but that’s part of our concerns. This is a real legal question, I don’t know anyone here who could answer- Greg: Good question. This is a question I’ve asked myself growing up as a Deaf person, me same with Alok and Jeff. It’s more of a philosophical view like providing an interpreter. The interpreter is assumed to be for that Deaf person but really, that interpreter is for everybody in the room, including the hearing people. Often, Deaf people
take on the responsibility for contacting interpreters and arranging everything, interpreters usually contact the Deaf person to accommodate and that puts the burden on the Deaf person. That’s what’s been happening. We all know that. If I need hearing aids, I go to the audiologist. If I needed a TTY a long time ago, I had to fill out a form so whatever's not being in this discussion, philosophically, point being VRS is a service. But understand this view, VRS is a service for everyone so now this isn’t intended to place the burden on Deaf people but we we know how to use VRS and can maximize the use for videophone services. To reach that point, we have to use that process. That can be a great philosophical discussion for another time but here is what this is now. Like Jeff said, this is part of the process now and we’re working with users, organizations, and at the same time, make sure there’s a system set up, well set, and we don’t want to revisit fraud again. We set something up where everybody is comfortable using this system. Jeff: Thank you Greg. Ok, Sheri? Sheri: Yeah, my response to your point is that going to a phone store for getting a TTY, we had to verify who we were. We had to pay for those old dial up phones, and connect that with our TTYs, right? But we were functionally equivalent with hearing people because they too had to go to the store to buy phones, so that validates we were on the same level as them. Whereas, in this case, we’re the only ones who have to verify ourselves and that doesn’t feel right. That’s where many users are coming from. Thank you. Jeff: Thank you Sheri. We have one or two more questions because time is running out so let's look at another question. [Facebook comment on screen] Octavian Robinson: What would the impact be on non-citizens currently in United States? For example, undocumented migrants, the displaced, and the visitors? Also how will our privacy rights be considered and protected? What steps will be taken to protect our data and privacy? Jeff: Now we’re going to address that question, since there’s more discussion, this is an important issue because this is America and we want to include everyone. Like I stated, ADA is not restricted to only US citizens but there are also laws and court issues that set up that undocumented say have the right to access, that’s a civil rights issue for ADA. So the question is how will this impact us? It’s a good concern, I myself did ask a few others who didn’t have documentations and a few other CAAGs and it’s tough. Many do not have that and Greg said we’ve been here for a while and we should at least have some documents, if not, then that’s a challenge we still can work around. So that’s a summary of our discussion, I don’t know anyone who can add to that. If not, we can go ahead to the next question. [Facebook comment on screen] Jeremy M. Jack (on behalf of CAAG customers): If I refuse to give you my personally information will you shut off my VRS? Jeff: Okay, we’re going to open that question to the panelists. Greg: Okay, I’ll answer. Sheri: What was the question? Jeff: I’m sorry; I’ll repeat the question. If I don’t want to share my SSN and have concerns about this, don’t feel comfortable, what are the consequences of that? How will that impact my abilities to use the VRS or not? Remember, the FCC rules say that they will not reimburse VRS providers for customers who are not registered with full information, which means the pressure is on the VRS providers. They may feel that if they will not be reimbursed for that customer, why should they provide service? That’s what the dynamics will look like. I’d like to ask Greg what his comments are on this. Greg: Thank you. VRS providers all know too well that if any problems appear, such as the user refusing to give their SSN, the providers will always contact the Disability office at FCC. We will quickly meet to discuss the issue. So really, it’s not just that individual’s problem, but everyone’s problem: the DRO, the consumer, and the provider. The three of us will work together to find a solution, so the answer to your question is, if you are an eligible person but refuse to give your SSN, we will work together to find a solution. Jeff: Thank you, any comments? That’s right,
there are a lot of issues, for example, if somebody clearly has an SSN but refuses to give their SSN, or gives out a fake SSN, it’s possible. There’s some database that validates if that SSN is real and belongs to that person, so like I said for a while, we’ve had a collaborative effort for a while and discussed this with FCC, the impact it would have in the last two years and how consumers would experience this issue so we had an open chat to understand your issues and concerns to collect information and go from there. Okay, looks like we are going to have one more question- no, we are going to close this as time ran out. I want to thank the panelists for their wonderful participation. You can see that FCC is very committed to engaging with the consumers. We really appreciate that. Sheri, thank you for your commitment and participation, too. Most of all, thank you to our audience for your time, interest, and involvement in this issue. We really want to make sure we all work together to provide you the best VRS experience, because that’s our future; it supports our opportunities in employment, education, and many more, so it’s really important. We want to do it right.