Before the
Federal Communications Commission
Washington, D.C. 20554

In the Matter of	
Implementation of Sections 716 and 717 of the Communications Act of 1934, as Enacted by the Twenty-First Century Communications and Video Accessibility Act of 2010	CG Docket No. 10-213
Telecommunication Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities	CG Docket No. 03-123
Consumer and Governmental Affairs, Media, and Wireless Telecommunications Bureaus Seek Update on Commission's Fulfillment of the Twenty-First Century Communications and Video Accessibility Act	GN Docket No. 21-140

NOTICE OF PROPOSED RULEMAKING

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By the Commission: Chairman Carr and Commissioner Trusty issuing separate statements

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I. INTRODUCTION

1. Rapid advances in technology are continually transforming the communications landscape. As communications devices and services have evolved, these advances have often enabled powerful new accessibility features and innovations. In this Notice of Proposed Rulemaking (*Notice*), we seek comment on modernizing the Commission's accessibility rules to ensure they are technology-neutral and forward-looking, reflect the current marketplace, and provide flexibility for developers to innovate and incorporate accessibility. We also seek comment on any marketplace barriers that impede accessibility, opportunities for improving communications accessibility and usability, as well as specific barriers to accessibility that have been identified in other proceedings.

II. BACKGROUND

A. The Commission's Accessibility Rules

2. Sections 255 and 251(a)(2) of the Communications Act of 1934, as amended (the Act), apply accessibility obligations to providers of telecommunications service and manufacturers of telecommunications equipment and customer premises equipment (CPE).[1] "To help ensure that individuals with disabilities are able to fully utilize communications services and equipment" in an age of Internet-based communication,[2] the Twenty-First Century Communications and Video Accessibility Act (CVAA)[3] built upon those obligations by adding sections 716, 717, and 718 to the Act.[4]

3. Section 716 addresses access to advanced communication services (ACS), defined as:[5] interconnected Voice over Internet Protocol (VoIP) service;[6] non-interconnected VoIP service;[7] electronic messaging service;[8] interoperable video conferencing service (IVCS);[9] and audio or video

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[1] *See* 47 U.S.C. § 255 (requiring that such services and equipment be accessible to and usable by individuals with disabilities, if readily achievable); *id.* § 251(a)(2) (prohibiting telecommunications carriers from installing network features, functions, or capabilities that do not comply with the guidelines and standards established pursuant to section 255 or 256 of the Act). These requirements were added with the passage of the Telecommunications Act of 1996. *See* Telecommunications Act of 1996, Pub. L. No. 104-104, 110 Stat. 56 (codified at 47 U.S.C. § 151 *et seq.*) (1996 Act).

[2] S. Rep. No. 111-386 at 1 (2010); H.R. Rep. No. 111-563 at 19 (2010).

[3] Twenty-First Century Communications and Video Accessibility Act of 2010, Pub. L. No. 111-260, 124 Stat. 2751, § 104 (2010) (CVAA); Amendment of Twenty-First Century Communications and Video Accessibility Act of 2010, Pub. L. No. 111-265, 124 Stat. 2795 (2010) (making technical corrections to the CVAA).

[4] CVAA, § 104 (2010) (adding, *inter alia*, sections 716, 717, and 718 to the Act, codified as 47 U.S.C. §§ 617, 618, 619).

[5] 47 U.S.C. § 153(1).

[6] *Interconnected VoIP service* means a service that (i) enables real-time, two-way voice communication; (ii) requires a broadband connection from the user's location; (iii) requires Internet protocol-compatible CPE; and (iv) permits users generally to receive calls that originate on the public switched telephone network (PSTN) and to terminate calls to the PSTN. 47 CFR § 9.3. However, section 716 provides that its requirements "shall not apply to any equipment or services, including interconnected VoIP service, that are subject to the requirements of section 255 of this title on the day before October 8, 2010. Such services and equipment shall remain subject to the requirements of section 255 of this title." 47 U.S.C. § 617(f).

[7] *Non-interconnected VoIP service* "(A) means a service that (i) enables real-time voice communications that originate from or terminate to the user's location using Internet protocol or any successor protocol; and (ii) requires Internet protocol compatible customer premises equipment; and (B) does not include any service that is an interconnected VoIP service." 47 U.S.C. § 153(36).

[8] *Electronic messaging service* "means a service that provides real-time or near real-time non-voice messages in text form between individuals over communications networks." 47 U.S.C. § 153(19). Electronic messaging service includes, *e.g.*, two-way interactive services such as text messaging, instant messaging, and electronic mail. The term

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communications services used by incarcerated people.[10] Section 716 requires providers of ACS and manufacturers of equipment used with ACS to ensure that their services, equipment, and software are accessible to and usable by people with disabilities, to the extent achievable[11] either by (1) building accessibility into the service or equipment, or (2) using third-party applications (or "apps"), peripheral devices, software, hardware, or CPE that is available to the consumer at nominal cost and that individuals with disabilities can access.[12] When ensuring accessibility through either of those options is not achievable, ACS providers and manufacturers must confirm that their services and equipment are compatible with existing peripheral devices or specialized CPE commonly used by individuals with disabilities to achieve access, unless that is also not achievable.[13] Section 716 also prohibits ACS providers from installing network features, functions, or capabilities that impede accessibility or usability.[14]

4. The Commission's rules implementing section 716—codified in part 14—supplement the corresponding provisions of parts 6 and 7 of the Commission's rules, which govern the accessibility of telecommunications and pre-2010 interconnected VoIP services, telecommunications equipment and customer premises equipment, and voicemail and interactive menu services and equipment.[15]

5. Section 717 directs the Commission to facilitate the filing of formal and informal complaints, adopt enforcement procedures, and implement recordkeeping obligations for manufacturers and service providers to ensure implementation of sections 716, 718, and 255 of the Act.[16] The regulations implementing these provisions are also codified in part 14 of the Commission's rules.[17]

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does not include blog posts, online publishing, or messages posted on social networking websites. *See Implementation of Sections 716 and 717 of the Communications Act of 1934, as Enacted by the Twenty-First Century Communications and Video Accessibility Act of 2010 et al.*, CG Docket No. 10-213 et al., Report and Order and Further Notice of Proposed Rulemaking, 26 FCC Rcd 14557, 14574, para. 43 (2011) (*2011 CVAA Implementation Order* or *2011 CVAA Implementation Further Notice*).

[9] *Interoperable video conferencing service* "means a service that provides real-time video communications, including audio, to enable users to share information of the user's choosing" 47 U.S.C. § 153(27).

[10] *See* Martha Wright-Reed Just and Reasonable Communications Act of 2022, Pub. L. No. 117–338, § 2(b), 136 Stat. 6156 (2023) (adding coverage of services used by incarcerated people).

[11] 47 U.S.C. § 617(a)(1), (b)(1). The Commission defines *accessible* to mean that (1) the input, control, and mechanical functions of the equipment, software, or service must be locatable, identifiable and operable by persons with varying abilities, and (2) all information necessary to operate and use the equipment, software, or service must be available to persons with varying abilities. 47 CFR § 14.21(b)(1), (2). The term *accessible* is further defined by listing specific performance objectives. *See* 47 CFR § 14.21(b)(1)-(4). *Usable* means that individuals with disabilities have access to the full functionality and documentation for the service, equipment, or software, including instructions, product information, documentation, and technical support functionally equivalent to that provided to individuals without disabilities. 47 CFR § 14.21(c). *Achievable* means "with reasonable effort or expense, as determined by the Commission." 47 U.S.C. § 617(g). Section 716 lists a number of factors that the Commission must consider in making a determination as to achievability. *Id.*

[12] 47 U.S.C. § 617(a)(2)(B), (b)(2)(B).

[13] 47 U.S.C. § 617(c).

[14] 47 U.S.C. § 617(d). Further, ACS and ACS equipment and networks may not impair or impede the accessibility of information content in which accessibility has been incorporated. 47 U.S.C. § 617(e)(1)(B).

[15] 47 CFR pts. 6, 7.

[16] 47 U.S.C. § 618.

[17] 47 CFR §§ 14.30-14.38.

6. Section 718 requires mobile phone service providers and manufacturers to make Internet browsers built into mobile phones accessible to and usable by people who are blind or have a visual impairment, unless doing so is not achievable.[18] As in section 716, this requirement may be satisfied with or without the use of third-party applications, peripheral devices, software, hardware, or CPE.[19]

7. Part 14 of the Commission's rules was initially adopted in 2011.[20] The rules were recently amended to address the accessibility of IVCS,[21] but the Commission has not conducted a general review of the part 14 rules since they were adopted.[22] Similarly, the Commission has not conducted a general review of the rules adopted in 1999 to implement sections 255 and 251(a)(2) of the Act.[23]

B. Today's Marketplace and Emerging Technologies

8. Today's communications marketplace scarcely resembles the communications marketplace in 2010, when Congress enacted the CVAA. The ownership of smartphones among American consumers has grown exponentially.[24] The proliferation of personal communications devices has transformed how people communicate in daily life and in professional, educational, and civic environments. More broadly, Internet usage—and with it, Internet-based methods of communication—has become ubiquitous.[25]

9. Emerging technologies continue to accelerate this transformation. Perhaps the most dramatic example of change driving today's marketplace can be seen in the rise and implementation of super intelligence.[26] Private investment in super intelligence in the U.S. reached $285.9 billion in 2025,[27]

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[18] 47 U.S.C. § 619(a); *see also* 47 CFR §§ 14.60-14.61 (implementing rules).

[19] 47 U.S.C. § 619(b); 47 CFR § 14.61(b).

[20] *2011 CVAA Implementation Order*, 26 FCC Rcd 14557.

[21] *See Access to Video Conferencing et al.*, CG Docket No. 23-161 et al., Second Report and Order and Further Notice of Proposed Rulemaking, 39 FCC Rcd 11068 (2024) (*2024 IVCS Order* or *IVCS Further Notice*).

[22] *See Consumer and Governmental Affairs, Media, and Wireless Telecommunications Bureaus Seek Update on Commission's Fulfillment of the Twenty-First Century Communications and Video Accessibility Act*, GN Docket No. 21-140, Public Notice, 36 FCC Rcd 7108 (CGB/MB/WTB 2021) (*CVAA Refresh Public Notice*) (broadly seeking comment regarding the Commission's implementation of the CVAA).

[23] *Implementation of Sections 255 and 251(a)(2) of the Communications Act of 1934, as enacted by the Telecommunications Act of 1996*, WT Docket No. 96-198, Report and Order and Further Notice of Inquiry, 16 FCC Rcd 6417 (1999) (*Section 255 Report and Order*).

[24] *See* Pew Research Center, *Americans' Use of Mobile Devices in 2026* (Oct. 19, 2026), https://www.pewresearch.org/internet/fact-sheet/mobile. A Pew Research Center survey of smartphone ownership in 2011 revealed that 35 percent of U.S. adults owned a smartphone and by 2025, that figure grew to 91 percent.

[25] *See* Pew Research Center, *Americans' Use of Internet, Broadband in 2026* (Oct. 19, 2026), https://www.pewresearch.org/internet/fact-sheet/internet-broadband. As of 2025, 96 percent of U.S. adults use the Internet, which is a 26.3 percent increase from 2010. Similarly, consumer use of telecommunications relay service (TRS) has shifted vastly from analog-based services to Internet Protocol (IP)-based TRS solutions. In 2010, text telephone (TTY) exceeded 6,442,000 usage minutes, but by the 2025-2026 TRS Fund Year, the projected usage minutes had dropped to just 658,000. *See Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities*; *Speech-to-Speech and Internet Protocol (IP) Speech-to-Speech Telecommunications Relay Services*, CG Docket Nos. 03-123 and 08-15, Notice of Proposed Rulemaking, 40 FCC Rcd 9528, 9531, para. 9 (2025).

[26] *See* Exec. Order No. 14434, 91 Fed. Reg. 63129 (Oct. 2, 2026) (explaining the executive branch shall use the terms "Super Intelligence" and "SI" in place of "Artificial Intelligence" and "AI").

and improved super intelligence and large language models play an ever-increasing role in shaping consumer communications experiences.[28] These developments have positively impacted accessibility capabilities in the communications marketplace. For example, automatic speech recognition (ASR) systems have become a "formidable alternative" to relying on human Communications Assistants (CAs) to provide phone call captioning and, today, "ASR-generated captions frequently approach or surpass the accuracy of human captioning while increasing speed and reducing cost."[29] The expanding use of ASR impacts the provision of TRS Fund services. Since 2018, when the Commission authorized the use of, and compensation for, fully automated ASR to produce captions for IP Captioned Telephone Service (IP CTS) calls,[30] there are now eight TRS providers that use ASR in offering IP CTS or IP Relay.[31] The introduction of ASR has significantly reduced cost barriers to providing captions, leading to new competitive services and options for people with disabilities. Users can now choose from three IP Relay and eight IP CTS providers.[32] Choice among providers allows consumers to opt between ASR or CA-assisted captions options, and among multiple types of equipment, including handsets, laptops, tablets, and wireless devices.

10. As another example, IVCS has also become a vital form of communication, transforming "from a niche product to a central pillar of our communications infrastructure."[33] Technological change continues apace, opening doors for innovative, accessible solutions, while also potentially introducing new accessibility barriers that periodically necessitate a fresh look at the Commission's rules.

11. Earlier this year, the FCC Consumer Protection and Accessibility Advisory Committee (CPAAC) submitted to the FCC a Report and Recommendations on Modern Communications and Associated Accessibility Opportunities and Considerations.[34] The Report explored the accessibility of a

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[27] *See* Stanford University Institute for Human-Centered Artificial Intelligence, The AI Index 2026 Annual Report at 182 (2026), https://hai.stanford.edu/ai-index/2026-ai-index-report or https://hai.stanford.edu/assets/files/ai_index_report_2026.pdf.

[28] *See, e.g.*, FCC Consumer Protection and Accessibility Advisory Committee (CPAAC), Advancements in Accessible Communications Technologies Working Group, Report on Modern Communications and Associated Accessibility Opportunities and Considerations at 3, 7 (June 10, 2026), https://www.fcc.gov/ecfs/document/10611141030439/1 (*CPAAC June 2026 Report*).

[29] *See Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities*; *Structure and Practices of the Video Relay Service Program*; *Misuse of Internet Protocol Relay Service*, CG Docket Nos. 03-123, 10-51, and 12-38, Notice of Proposed Rulemaking, 41 FCC Rcd 907, 913, para. 17 (2026) (*Internet-Based TRS Modernization Notice*).

[30] *Misuse of Internet Protocol (IP) Captioned Telephone Service*; *Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities*, CG Docket Nos. 13-24 and 03-123, Report and Order, Declaratory Ruling, Further Notice of Proposed Rulemaking, and Notice of Inquiry, 33 FCC Rcd 5800, 5827, para. 48 (2018) (*2018 ASR Declaratory Ruling*).

[31] IP CTS providers may use ASR in combination with, or in lieu of, CAs. *See, e.g.*, *Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities, Internet-based TRS Certification Application of Mezmo Corporation to Provider IP Relay Service*, CG Docket No. 03-123, Order, 39 FCC Rcd 13800 (CGB 2024) (granting InnoCaption a two-year conditional certification to provide fully automatic IP Relay in addition to ASR-based and CA-assisted forms of IP CTS).

[32] *See* FCC, *Internet-based TRS Providers*, https://www.fcc.gov/general/internet-based-trs-providers (last visited Oct. 6, 2026).

[33] *Access to Video Conferencing*; *Implementation of Sections 716 and 717 of the Communications Act of 1934, as Enacted by the Twenty-First Century Communications and Video Accessibility Act of 2010*, CG Docket No. 23-161, Report and Order, Notice of Proposed Rulemaking, and Order, 38 FCC Rcd 6300, 6303, para. 6 (2023) *(2023 IVCS Order* or *Notice*, as appropriate). *See supra* note 9; IVCS allows two or more people to engage in real-time video conversations over the internet.

number of emerging technologies as well as their potential for improving accessibility. As part of the Report, the CPAAC recommended that the FCC seek "public feedback on new and emerging technologies, applications and services that have the potential to be transformative to our aging population and people with disabilities, and to ensure that communications devices support these technologies for the benefit of people with disabilities" and went on to include specific areas for exploration.[35]

C. Principles for Fostering Innovation and Ensuring Accessibility

12. The Commission has long taken an outcome-oriented approach to fostering innovation and promoting accessibility. In implementing the Telecommunications Act of 1996,[36] the Commission adopted outcome-oriented definitions of "accessible," "compatible," and "usable,"[37] and the Commission later incorporated those definitions into the performance objectives contained in part 14 of the rules.[38] Section 716 of the Act "expressly requires the Commission to allow flexibility in the implementation of accessibility objectives and precludes [the Commission] from imposing mandatory standards."[39] That statutory directive reflects Congress' recognition that communications technologies evolve rapidly and that prescriptive requirements could have the unintended consequence of constraining innovation or preventing new accessibility solutions from emerging.[40]

13. Consistent with its statutory mandates, the Commission allows manufacturers and service providers to "choose whether to satisfy their accessibility obligations by building certain features directly into their applications or by 'using third party applications, peripheral devices, software, hardware, or [customer premises equipment] that is available to the consumer at nominal cost and that individuals with disabilities can access.'"[41] This flexibility allows manufacturers and service providers to innovate in

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[34] *See CPAAC June 2026 Report*.

[35] *CPAAC June 2026 Report* at 10-11.

[36] *See* 1996 Act.

[37] *See* 47 CFR §§ 6.3, 7.3; *Section 255 Report and Order*, 16 FCC Rcd at 6429-35, paras. 21-36 (*Section 255 Report and Order*). *See also Section 255 Report and Order*, 16 FCC Rcd at 6442, para. 54 (stating that the "readily achievable" framework "will provide manufacturers and service providers a viable means of compliance with section 255, while promoting accessibility to the maximum extent possible. We expect that different companies, faced with unique circumstances, may well come to different conclusions about deployment of accessibility features. We believe that is a desirable outcome that will maximize the range and depth of accessible products and services available and will capitalize on the positive forces of competition.").

[38] *See 2011 CVAA Implementation Order*, 26 FCC Rcd at 14647, para. 211 ("We incorporate into these general performance objectives the outcome-oriented definitions of accessible, compatibility, and usable, contained in sections 6.3 and 7.3 of the Commission's rules."); *Implementation of Sections 716 and 717 of the Communications Act of 1934, as Enacted by the Twenty-First Century Communications and Video Accessibility Act of 2010 et al.*, CG Docket No. 10-213 et al., Notice of Proposed Rulemaking, 26 FCC Rcd 3133, 3172, para. 105 (2011) (*2011 CVAA Implementation Notice*) ("[W]e agree with those commenters who suggest that we incorporate into the performance objectives the outcome-oriented definitions of 'accessible,' 'compatibility,' and 'usable' . . .").

[39] *2024 IVCS Order*, 39 FCC Rcd at 11082 n.116 (citing 47 U.S.C. § 617(a)(2), (e)(1)(D)).

[40] *See* S. Rep. No. 111–386, at 1 (2010) (explaining that, since the passage of the Telecommunications Act of 1996, "the communications marketplace has undergone a fundamental transformation"); H.R. Rep. No. 111-563, at 19 (2010) (noting also a "fundamental transformation"); *2011 CVAA Implementation Order*, 26 FCC Rcd at 14560, para. 4 ("In keeping with Congress's clear direction, our actions today advance the accessibility of ACS in a manner that is consistent with our objectives of promoting investment and innovation, while being mindful of the potential burden on industry. We have crafted our rules to provide manufacturers and service providers flexibility in how they achieve accessibility.").

[41] *2024 IVCS Order*, 39 FCC Rcd 11082-83, para. 32 (citing 47 U.S.C. § 617(b)(2)(B)). In addition to the generally applicable performance objectives in part 14 of the rules, interoperable video conferencing service providers must

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determining how best to meet the required performance objectives and ensure the accessibility of their products and services.

III. MODERNIZING FCC RULES FOR EMERGING TECHNOLOGIES

14. In this section, we seek input on actions the Commission can take to modernize its accessibility rules to better support accessible communication and innovation in a rapidly evolving communications marketplace.[42] We first seek comment on whether the existing outcome-oriented accessibility framework continues to function as intended, whether any rules inhibit the development or deployment of accessible technologies, encouraging accessible design at the earliest stages of product development, and the extent to which regulatory uncertainty may discourage accessible innovation. Second, we propose multiple rule changes to streamline rules that may be duplicative, outdated, superfluous, or unnecessarily burdensome.

A. Encouraging Innovation with Outcome-Oriented Rules

15. The Commission's accessibility rules apply based on the functions a service or device provides. Parts 6, 7, and 14 of the rules collectively establish an outcome-oriented accessibility framework covering telecommunications services and equipment, ACS and ACS equipment, and Internet browsers built into mobile phones.[43] As communications technologies continue to advance and converge, these rules apply in increasingly diverse product environments, including multipurpose devices, software-based communications platforms, and real-time communications embedded in social media and other online platforms.

16. *Discussion*. The Commission strives to ensure that its accessibility framework is as outcome-oriented and flexible as possible.[44] But the explosive pace of technological innovation in today's economy sometimes results in misalignment between the FCC's rules and market realities.[45] In

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also comply with additional outcome-oriented performance objectives. *See id.*; 47 CFR § 14.21(b)(4). As stated in the *2024 IVCS Order*, "Part 14 performance objectives are subject to the caveat that compliance is not required if the performance objective is not 'achievable'—a criterion that is defined in terms of 'reasonable effort or expense.' 47 CFR § 14.10(b). However, while entities may petition for waiver of the performance objectives, the CVAA did not grant the Commission authority to make ACS performance objectives optional. *See* 47 U.S.C. § 617(e)(1)(A)." *2024 IVCS Order*, 39 FCC Rcd at 11082, para. 31, n.115.

[42] In an *ex parte* submission, a coalition of accessibility organizations encouraged the Commission to "seek targeted supplemental comments to update the record in accessibility proceedings that remain unresolved, rather than allowing those matters to remain pending while the Commission asks broader open-ended questions in this proceeding." Letter from AnnMarie Killian, President & CEO, TDIforAccess, Inc., to Marlene H. Dortch, Secretary, FCC, CG Docket Nos. 10-213 and 03-123, GN Docket No. 21-140, at 1 (filed Oct. 21, 2026) (Accessibility Organizations Letter). This *Notice* is not intended to supplant, supersede, or otherwise delay the Commission's consideration of any current proceeding. Rather, this proceeding serves as a companion piece to those proceedings, with a broader examination of the market forces that may be driving the experiences of consumers with disabilities, along with a specific evaluation of technical and design barriers to accessibility and other issues as identified in Part V, *supra*.

[43] 47 CFR pts. 6, 7, 14.

[44] *See supra* note 40.

[45] *See, e.g.*, Accessibility Advocacy and Research Organizations Reply Comments, GN Docket No. 21-140, at 1 (rec. July 6, 2021) ("[T]he Commission's accessibility rules . . . must be updated to address significant barriers that have arisen over the past two decades. In response to the [*CVAA Refresh Public Notice*], more than two dozen leading disability organizations and numerous people with disabilities have urged the Commission to act."); Accessibility Advocacy Organizations (AAO) Tentative Findings Comments, CG Docket No. 10-213, at 3 (rec. Aug. 10, 2026) (AAO Tentative Findings Comments) ("The Accessibility Advocacy Organizations generally agree . . . the 'accessibility' gaps that remain are persistent and significant accessibility barriers that continue to affect everyday communications for individuals with disabilities.").

this examination of our rules, we aim to better align our rules with the present state of the marketplace and design them to be responsive to future innovation. As we note above, the Commission has not yet undertaken a comprehensive review of either its part 14 rules adopted in 2011 to implement the CVAA, or its rules adopted in 1999 implementing sections 255 and 251(a)(2) of the Act.[46]

17. We therefore seek comment on whether the Commission's accessibility framework remains appropriately outcome-oriented, and whether our existing accessibility rules may hinder innovation. Do the Commission's accessibility rules impact the speed of innovation in communications technologies or accessible functionality, and if so, how? Do the rules produce any impediments to innovation or delay deployment of new communications technologies or accessibility functionality?

18. Do the performance objectives outlined in parts 6, 7, and 14 of the rules strike the correct balance in achieving accessibility, usability, and compatibility, without overly burdening innovation? What effect do the performance objectives have on the design of any new or emerging communications technologies, products, or services? Are there any negative impacts? We seek input on any proposals to address such concerns, to the extent they exist.[47] Are there changes to the performance objectives that would both improve access to communications technology by people with disabilities, and accelerate the development of new applications, services, or devices?

19. We also invite commenters to share any concerns related to determining whether an application, service, or device is accessible to or usable by people with disabilities. Does the Commission's existing framework delineate sufficient parameters and provide enough certainty for complying with the performance objectives? We ask that commenters provide specific proposals about any suggested improvements that can be made in this regard, while keeping in mind that the CVAA prohibits the Commission from mandating any technical standards.[48]

20. In addition, we invite commenters to share any concerns related to determining whether an application, service, or device is compatible with peripheral devices or specialized customer premises equipment.[49] Are there any changes to the rules that could improve the existing compatibility performance objectives without hindering equipment manufacturers or service providers?

21. We seek comment on whether the accessibility framework in parts 6, 7, and 14 of the rules provides sufficient flexibility for service providers and equipment manufacturers to design innovative and accessible products and services. The Commission has made clear that the required performance objectives are outcome-oriented and flexible in an effort to achieve innovation in accessibility.[50] Given those objectives, we seek comment as to whether there are aspects of the current framework that may be overly prescriptive. Commenters should explain with specificity how any aspects of the rules may negatively impact innovation in accessibility. Do the performance objectives that require service providers and manufacturers to factor in accessibility at the design stage of development create barriers to market entry? Are there market segments in which such barriers may be greater? For example, for communications services that are associated with social media platforms, do the Commission's performance objectives promoting accessibility produce any barriers to entry greater than for other types of communications services?[51] We also invite comment on the processes that service

[46] *See supra* para. 7.

[47] *See, e.g.*, *infra* paras. 55-56 (describing the communications needs of people who use augmentative and alternative communications and people with multiple disabilities).

[48] *See* 47 U.S.C. § 617(e)(1)(D).

[49] *See* 47 U.S.C. § 617(c); 47 CFR § 14.21(a), (d).

[50] *See supra* para. 12.

providers and equipment manufacturers utilize to comply with the performance objectives. To what extent are covered entities utilizing industry collaboration, consumer engagement, and voluntary standards to comply with the Commission's accessibility framework? Are there other processes or methods that covered entities use to comply with our accessibility framework?

22. Finally, we seek comment on whether any market segment or emerging communications technologies face regulatory uncertainty to the detriment of accessibility.[52] Are there any provisions of our rules that lack sufficient clarity in a way that discourages accessible design in products and services? We invite commenters to discuss specific proposals for improving the rules in a way that would improve regulatory certainty or encourage accessible design.

B. Modernization of Legacy Requirements

23. Consistent with the Administration's policies,[53] the Commission's *2025 Delete Public Notice*,[54] and public comments received in response, we propose multiple changes to streamline our rules and eliminate provisions that we deem duplicative, outdated, superfluous, or unnecessarily burdensome.[55] We seek comment on the following proposed revisions to parts 6, 7, and 14 of the Commission's rules and on whether any of the proposed revisions may impact small business entities.

1. Part 6 – Accessibility of Telecommunications and Interconnected VoIP Services, and Associated Equipment

24. *Section 6.3(a)(3)*, *(b)(5) (Definitions)*. To make these provisions consistent with other language in our rules, we propose to change the phrase "in accordance with 47 CFR part 67" in each provision to "in accordance with part 67 of this chapter."

25. *Section 6.7(b) (Product Design, Development, and Evaluation)*. This provision currently encourages covered entities to consider several accessibility factors in the entities' product design and development phases. For example, when conducting market research or testing products, covered entities are advised to include people with disabilities in those processes.[56] The provision does not mandate that any specific action be taken. Rather, it describes factors that covered entities should consider "as the

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[51] *See 2011 CVAA Implementation Order*, 26 FCC Rcd at 14574-75, para. 43 (explaining that electronic messaging service includes "text messaging, instant messaging, and electronic mail" as well as "the two-way interactive services offered through such [social media] websites").

[52] *See, e.g.*, *Implications of Artificial Intelligence Technologies on Protecting Consumers from Unwanted Robocalls and Robotexts*, CG Docket No. 23-362, Notice of Proposed Rulemaking and Notice of Inquiry, 39 FCC Rcd 9203, 9210-14, paras. 19-28 (2024) (proposing an exemption from Telephone Consumer Protection Act requirements for "artificial or prerecorded voice calls made by an individual with a speech or hearing disability using any technology, including artificial intelligence technologies, designed to facilitate the ability of such individuals to communicate over the telephone").

[53] *See, e.g.*, Executive Order 14192 of January 31, 2025, *Unleashing Prosperity Through Deregulation*, 24 Fed. Reg. 9065 (Feb. 6, 2025); *see also* Executive Order 14219 of February 19, 2025, *Ensuring Lawful Governance and Implementing the President's "Department of Government Efficiency" Deregulatory Initiative*, 36 Fed. Reg. 10583 (Feb. 25, 2025).

[54] *In Re: Delete, Delete, Delete*, GN Docket No. 25-133 (Mar. 12, 2025).

[55] *See also Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities*; *Delete, Delete, Delete*, CG Docket No. 03-123, GN Docket No. 25-133, Report and Order, FCC 26-56 (Aug. 21, 2026) (eliminating the requirement that traditional TTY-based TRS be capable of communicating with the all-but-obsolete ASCII standard).

[56] 47 CFR § 6.7(b)(1)-(2).

manufacturer deems appropriate."[57] We also note that, in 2011, when the Commission adopted part 14 of its rules, to implement the CVAA, this provision was not incorporated into the corresponding part 14 rule.

26. The Commission believes the considerations listed in section 6.7(b) are best viewed as guidance, because they are items for a manufacturer or service provider to consider without a specific direction to act to implement any of the factors. As such, we seek comment on deleting section 6.7(b) and publishing these factors for evaluating product design and development for accessibility on the Commission's Disability Rights Office (DRO) web pages, alongside other helpful, accessibility-focused guidance.[58] Once published on the webpage as guidance, DRO would publicize any updates or changes made to the guidance.

27. *Section 6.11(c) (Training).* While training programs are important for ensuring the accessibility and usability of covered equipment and services, the provision recommends topical areas for training, but does not require training. Training programs and their content are not an explicit requirement of section 255, but rather were developed by the U.S. Access Board in conjunction with the Commission and published as guidelines.[59] Given the nature of the provision and recognition that relevant topical areas may change as innovation continues, we seek comment on deleting this provision and having the Consumer and Governmental Affairs Bureau (CGB) publish and maintain recommended training topics on the Commission's DRO web pages as resource material.

2. Part 7 – Accessibility of Voicemail and Interactive Menu Services and Equipment

28. There is a significant amount of duplication in the texts of part 6 and part 7 of the Commission's rules. We believe that manufacturers and providers subject to part 7 can fully and easily understand these regulatory obligations by familiarizing themselves with the text of part 6. For that reason, we propose to streamline part 7 by deleting or amending the following provisions:

29. *Sections 7.3(a), (c)-(d), (f)-(l), and (o) (Definitions of Various Terms).* We propose to amend these provisions, which duplicate nearly identical definitions in part 6, to state that each term has the same meaning as in the corresponding provision of section 6.3.

30. *Section 7.3(b) (Definition of "Compatibility").* Paragraphs (1)-(5) of this provision are duplicative of section 6.3(b). We propose to amend this provision to delete those paragraphs and state instead that covered entities shall also comply with section 6.3(b)(1)-(5).

31. *Section 7.3(n) (Definition of "Real-Time Text").* We propose to delete this definition. If the proposals above are adopted, all references to the term "real-time text" will appear in part 6. There is thus no need to define the term in part 7.

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[57] 47 CFR § 6.7(b).

[58] This proposal is not meant to imply that these factors, or any other best practices that may be relocated to the Commission's DRO web pages, are unimportant. *See, e.g.*, *2011 CVAA Implementation Order*, 26 FCC Rcd at 14596, para. 94 n.214 ("While we will not impose specific user testing requirements, we support the practice of user testing and agree . . . that user testing benefits individuals with a wide range of disabilities."). To the contrary, in the event of a consumer complaint, evidence that a covered entity implemented the relevant best practices with respect to a product may be deemed sufficient to demonstrate that the entity has evaluated the accessibility, usability, and compatibility of such product in its design and development process. *See* 47 CFR § 6.7(a).

[59] *See* 47 U.S.C. § 255(e) (directing "the Architectural and Transportation Barriers Compliance Board to develop guidelines for accessibility of telecommunications equipment and customer premises equipment in conjunction with the Commission"). In 2017, the U.S. Access Board published revised section 255 guidelines that no longer lists the training topics. *See* 36 CFR pt. 1194 (Information and Communication Technology Standards and Guidelines).

32. *Section 7.7(b) (Product Design, Development, and Evaluation).* For the same reasons discussed above in relation to the identical language in section 6.7(b), we seek comment on deleting section 7.7(b) and relocating the information contained therein to the Commission's DRO web pages.

33. *Section 7.11(c) (Training).* For the same reasons discussed above in relation to the identical section 6.11(c), we seek comment on whether to relocate the information contained in section 7.11(c) to the Commission's DRO web pages.

3. Part 14 – Accessibility of Advanced Communications Services and Equipment

34. *Section 14.1 (Scope of Part 14).*[60] To describe more precisely the scope of this part, we propose to amend section 14.1 to include references to sections 14.30 and 14.60, to reflect that certain provisions of part 14 apply more broadly,[61] and certain others apply more narrowly,[62] than currently indicated by the text of paragraphs (a) and (b).

35. *Section 14.2(c) (Application of Section 716(f) of the Act).* We propose to amend section 14.2(c) to describe more precisely the scope of the statutory limitation incorporated in this rule. Section 716(f) of the Act[63] limits the application of section 716, but not sections 717 (addressing enforcement and recordkeeping for sections 255, 716, and 718 of the Act) and 718 (addressing the accessibility of Internet browsers built into telephones used with public mobile services). Part 14 includes provisions implementing all three sections of the Act. Thus, the proposed amendment, to directly reference subpart C, would indicate more precisely the actual scope of the limitation stated in section 716(f) of the Act. Subpart C includes the obligations for manufacturers under the part 14 rules. To describe more precisely the scope of the statutory limitation incorporated in this rule, we propose to amend section 14.2(c) to read:

> The requirements of subpart C of this part shall not apply to any equipment or services, including interconnected VoIP service, that are subject to the requirements of section 255 on the day before the date of enactment of the Twenty-First Century Communications and Video Accessibility Act of 2010. Such services and equipment shall remain subject to the requirements of section 255 of this title.

36. *Section 14.30 (Recordkeeping and Enforcement).* Section 14.30(b) and (c) refer to the 2013 effective dates for applicable recordkeeping and enforcement obligations, respectively. We propose deleting these provisions as outdated and no longer needed.

37. *Section 14.31 (Recordkeeping).* We propose modifications to the recordkeeping requirements in section 14.31 by removing references to out-of-date technology (i.e., TTY and facsimile numbers) in section 14.31(b)(2).

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[60] 47 CFR § 14.1.

[61] *See* 47 CFR § 14.30(a) ("The rules in this subpart regarding recordkeeping and enforcement are applicable to all manufacturers and service providers that are subject to the requirements of sections 255, 716, and 718 of the Act and parts 6, 7 and 14 of this chapter.").

[62] *See* 47 CFR § 14.60(a) ("This subpart E shall apply to a manufacturer of a telephone used with public mobile services . . . that includes an Internet browser in such telephone . . . , or a provider of mobile services that arranges for the inclusion of a browser in telephones . . . .").

[63] Section 716 of the CVAA, 47 U.S.C. § 617, covers access to advanced communication services and equipment. Section 716(f) includes a carveout for services and equipment that were covered by section 255 of the Communications Act prior to the enactment of the CVAA. This includes, e.g., interconnected VoIP services subject to the requirements of section 255 on the day before the date of enactment of the CVAA, i.e., covered as of Oct. 7, 2010. Such services and equipment shall remain subject to the requirements of section 255.

38. *Section 14.32 (Consumer Dispute Assistance).* The Commission proposes to amend section 14.32, which covers the Consumer Dispute Assistance process,[64] to streamline the rule and remove references to obsolete or rarely used technologies, such as TTY and audio cassettes. Specifically, we propose to modify section 14.32(a) to remove a prescriptive process for contacting the Consumer and Governmental Affairs Bureau on such matters, and to retain language that a consumer may do so by "any reasonable means." We also propose to remove the examples in section 14.32(b)(5), which references the outdated or rarely used technology formats.[65] We also seek comment on whether to remove text that may be overly prescriptive. For example, should we modify or delete the detailed requirements of paragraph (b) regarding the content of a Request for Dispute Assistance (RDA)? Would informal agency guidance provide a more flexible and effective vehicle for ensuring that necessary details are included? Could removing these details from the codified rule lead to inefficiency, uncertainty regarding what RDAs must contain, or the omission of information necessary to facilitate the RDA process?

39. *Sections 14.33-14.38 (Complaints).* These rules implement provisions of the CVAA requiring the Commission to establish procedures for filing and enforcing formal and informal complaints alleging a violation of section 255, 716, or 718.[66] With respect to informal complaints, we propose removing references to obsolete technologies such as audio cassettes. We also propose deleting section 14.34(c). This provision merely provides contact information, which may become dated, and can be effectively provided via the Commission's website. Further, we propose to delete section 14.36(b)(1)(vi), a formatting requirement that is outdated and that we believe is no longer needed.

40. With respect to formal complaints, we propose to amend section 14.38 of the rules to remove paragraphs (a)–(i) (and correct the punctuation of a cross-reference in the remaining text). In 2018, the Commission adopted a uniform set of rules for formal complaint proceedings on various subjects, including the accessibility of advanced communications services and equipment.[67] The substantive provisions of section 14.38 are duplicative of—and often identical to—corresponding provisions of section 1.721. We seek comment on whether deleting paragraphs (a) through (i) will change applicable requirements in any adverse manner.

IV. IDENTIFYING MARKETPLACE BARRIERS

41. In this section, we seek comment on marketplace and technical factors affecting accessibility. We begin by seeking comment on interoperability across communications platforms, devices, and services. We then explore whether there are any economic and technical barriers to accessible devices, compatibility with third-party accessibility tools, and the current state of accessibility on social media and on emerging technologies such as virtual or augmented reality. We also discuss accessibility across multipurpose devices and seek comment on whether accessibility is considered early in product design. Finally, we seek comment on access capabilities for people who use augmentative and alternative communications (AAC) and for individuals with multiple disabilities.

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[64] The Consumer Dispute Assistance process, or Request for Dispute Assistance (RDA) process, is designed to promote efficient problem-solving by encouraging the swift delivery of practicable accessibility solutions. *2011 CVAA Implementation Order*, 26 FCC Rcd at 14656-60, paras. 233-40. RDAs offer covered entities the opportunity to address accessibility concerns privately and with mediation, without public admissions of liability. *Id.* The RDA approach was developed as a preliminary stage that allows parties an opportunity to resolve issues prior to invoking the informal and formal complaint processes provided for in the CVAA. *Id.*

[65] Section 14.32(b)(5) of 45 C.F.R. permits the requestor to provide its preferred format or method of response to the Bureau, and states examples that include letter, facsimile transmission, TTY, and audio cassette recording. We propose to remove these examples, including outdated methods of communication, from the rule.

[66] 47 U.S.C. § 618(a).

[67] *Amendment of Procedural Rules Governing Formal Complaint Proceedings Delegated to the Enforcement Bureau*, EB Docket No. 17-245, Report and Order, 33 FCC Rcd 7178 (2018).

42. *Interoperability and Accessibility*. The Commission seeks comment on the ability of different ACS technologies to communicate with one another. For example, to what degree can a consumer sending and receiving messages on one type of device or software communicate with a consumer on a different device or software? Some messaging platforms function seamlessly regardless of what operating system or device each user is using. However, some messaging platforms or services do not maintain the same level of features, functions, and other capabilities regardless of what device or operating system is utilized. As a result, these incompatibilities may affect accessibility and usability of certain messaging services for people with disabilities. We seek comment on the prevalence of this issue and how communications by people with disabilities are impacted.

43. Are there aspects of the consumer communications marketplace that have advanced towards greater interoperability? For example, the rise of "cross-platform" video gaming may be one such example. At the advent of in-home multiplayer gaming with remote players, users of a home video game console or personal computer (PC) could only interact with other users of the same console or other PC users. Today, however, many of the most popular multiplayer titles enable cross-platform gameplay, including in-game voice chat, a feature the Commission has specifically identified as within the purview of the CVAA.[68] We seek comment on other examples, particularly where innovation has flourished to the benefit of those within the disability community.

44. We invite comment on achieving increased interoperability in other areas of advanced communication services. For example, where interoperability has increased (e.g., cross-platform gaming), what market forces or technical developments have facilitated this change? In that regard, we encourage comments from industry on how technical advancements have facilitated interoperability. How can these forces and developments be applied to other areas of the communications marketplace? We seek comment on whether technology that has advanced interoperability for certain devices, e.g., gaming devices, can facilitate interoperability for other devices. Are there market segments where consumers prefer to maintain product status quo? If so, we seek to understand what is driving these preferences. Additionally, are there barriers that create a tension between innovation and interoperability, and if so, what are they?

45. How does a lack of interoperability impact accessibility across services and platforms? To what extent is interoperability, e.g., among messaging services and software, necessary to ensure communications access to a person with disabilities? Are there features and functions that people with disabilities forgo when choosing products and services that meet their accessibility needs, such as the ability to receive encrypted communications or accessible documents and images from outside their product's ecosystem, or the ability to use certain kinds of third-party applications—e.g., where a workplace, school, or community group uses a different messaging product or platform?

46. To the extent interoperability between different services of the same type is possible, should it impact the Commission's analysis of whether that service is accessible or usable by people with disabilities? The Commission has previously stated that the CVAA did not impose an interoperability obligation.[69] However, the lack of an affirmative interoperability requirement does not necessarily

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[68] *See* Runkun Shen et al., *Cross Platform Gaming: More Than the Sum of Its Parts?*, ACM Digital Library (Nov. 28, 2025), https://dl.acm.org/doi/10.1145/3774417#core-Bib0055-1. *See also Implementation of Sections 716 and 717 of the Communications Act of 1934, as Enacted by the Twenty-First Century Communications and Video Accessibility Act of 2010*; *Consumer Electronics Association*; *National Cable & Telecommunications Association*; *Entertainment Software Association*; *Petitions for Class Waivers of Sections 716 and 717 of the Communications Act and Part 14 of the Commission's Rules Requiring Access to Advanced Communications Services (ACS) and Equipment by People with Disabilities*, CG Docket No. 10-213, Order, 27 FCC Rcd 12988 (CGB 2012) (concluding that video game console manufacturers must ensure that non-interconnected VoIP communications (e.g., in-game voice chat) are accessible and usable, if achievable).

[69] In analyzing whether Congress adding the word "interoperable" to the phrase "video conference services" created an interoperability requirement, the Commission determined that no language in the CVAA supported the view "that (continued….)

suggest that actions to delay or prevent interoperability may not impede or impair accessibility or usability.[70] We seek comment on this idea. How should we ensure that consumers are able to use devices and services with the features and functions to meet their accessibility needs while maintaining access to as widely available communications network, as possible?

47. *Compatibility with Third-Party Solutions*. We also seek comment on what ACS and ACS equipment are compatible with third-party accessibility solutions.[71] Are there clear and transparent policies and pathways to allow third-party devices and applications to interoperate seamlessly with various products in the ACS marketplace? Are there specific types of equipment, software, or services that have more compatibility challenges in this regard? Are there specific examples of accessibility features that work well with some types of equipment, software, or services but not with others? To what extent would a compatibility requirement between proprietary ACS systems and third-party accessibility applications remove barriers to accessibility? Would there be any adverse effects of such a compatibility requirement?

48. *Social Media Platforms*. Social media platforms that provide two-way, interactive, person-to-person communication through direct messages, video chats, or other features have a duty to make such communication accessible.[72] We therefore seek comment on the current state of accessibility on covered social media platforms, including whether companies are aware of their obligations under the CVAA. We also seek comment on the reasons for any accessibility gaps affecting such services. Is there a need for additional education and outreach to help ensure that social media companies are aware of their CVAA requirements? Can third-party accessibility tools such as screen readers and captioning be used effectively on social media platforms? We seek comment from industry stakeholders to understand the technical demands for addressing accessibility on social media platforms and the efforts undertaken to assess the usability and accessibility of their platforms and services for people with disabilities.

49. *Accessibility and Emerging Technologies*. The CVAA's accessibility requirements are intended to be future-proof, in that their application is not limited to a particular technology or a currently existing service or device. Instead, they are broadly applicable to any services and equipment that permit specified kinds of communication.[73] The Commission anticipates that new technologies will emerge to provide better or more comprehensive accessibility solutions for ACS. For example, products utilizing virtual, augmented, or mixed reality (as a group, colloquially known as "XR") technologies have begun to change the way individuals experience and interact with the world.[74] With the help of machine learning,

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interoperability is requirement or should be required, or that [the Commission] may require video conferencing services to be interoperable . . ." *See 2011 CVAA Implementation Order*, 26 FCC Rcd at 14577, para. 48.

[70] *See* 47 CFR § 14.20(a)(4) ("Providers of advanced communications services shall not install network features, functions, or capabilities that impede accessibility or usability."); 47 U.S.C. § 617(d) ("Each provider of advanced communications services has the duty not to install network features, functions, or capabilities that impede accessibility or usability."); *see also* 47 CFR § 14.20(a)(5) ("Providers of advanced communications services, manufacturers of equipment used with these services, and providers of networks used with these services may not impair or impede the accessibility of information content when accessibility has been incorporated into that content for transmission through such services, equipment or networks."); 47 U.S.C. § 617(e)(1)(B) (requiring that the Commission adopt such a rule).

[71] *See* 47 U.S.C. § 617(a)(2)(B), (b)(2)(B); 47 U.S.C. § 617(c).

[72] *See 2011 CVAA Implementation Order*, 26 FCC Rcd at 14574-75, para. 43 (explaining that *electronic messaging service* does not include "blog posts, online publishing, or messages posted on social networking websites," but does include "the two-way interactive services offered through such websites"). Additionally, real-time video conversations on social media platforms fall within the definition of interoperable video conferencing services and so must comply with the part 14 performance objectives.

[73] *See* 47 U.S.C. § 153(19), (27), (36).

these technologies can help convert sound into text, convert text and images into sound, indicate the direction of sounds, provide haptic feedback, and enhance vision, among other possible applications.[75] We seek comment on how emerging technologies can be used to enhance communications access for people with disabilities. We also seek comment on measuring and evaluating the reliability and accuracy of emerging technologies and accessibility tools that are enabled by super intelligence or machine learning.

50. Are there other emerging technologies that may lend themselves to accessibility solutions for ACS? We seek comment on emerging technologies that incorporate ACS, have been incorporated into ACS, or should themselves be identified as ACS. Are these emerging technologies generally compatible with existing assistive devices? Are people with disabilities included in the planning and development of these new technologies?

51. *Multipurpose Devices and Services.* ACS are often integrated into everyday devices. Absent a waiver, those devices are subject to the Commission's part 14 rules, even if the device was not primarily designed for communication.[76] Multipurpose devices span a broad spectrum, from mobile phones and computers to home video gaming consoles, smart TVs, certain household appliances, streaming devices, and virtual reality devices.

52. We seek comment on the extent to which accessibility has been achieved in multipurpose platforms and devices. For example, to what extent are manufacturers of multipurpose equipment aware of their CVAA obligations?[77] Are there specific types of multipurpose equipment that are currently inaccessible? Are there specific challenges or concerns associated with accessibility on multipurpose services or equipment? How early and effectively are people with disabilities involved in the design process of these devices?

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[74] *See* Funka, New Realities: Unlocking the Potential of XR for Persons with Disabilities (2021), https://www.funka.com/contentassets/e5b37edc566b4454a57dc6dce6088c4f/new_realities_xr_for_pwd.pdf (a brief overview of XR technologies).

[75] *See, e.g.*, New England Low Vision and Blindness, *Top 10 Text to Speech Devices* (May 12, 2026), https://nelowvision.com/top-10-text-to-speech-aids/; The Lighthouse for the Blind, Inc., *WEBINAR: Eyes on Innovation, A Deep Dive into AI-Powered Smart Glasses for Blind People* (Oct. 24, 2024), https://lhblind.org/webinar-eyes-on-innovation-a-deep-dive-into-ai-powered-smart-glasses-for-the-blind/.

[76] *See 2011 CVAA Implementation Order*, 26 FCC Rcd at 14572-73, para. 76 (rejecting argument that section 716(a) of the Act should apply only to equipment with a "primary purpose" of offering ACS); see also 47 U.S.C. § 617(h) (authorizing the Commission to waive accessibility requirements for multipurpose equipment that "is designed primarily for purposes other than using [ACS]"). Multipurpose here refers to any service or equipment that serves multiple purposes, one of which is to enable real-time (or near-real-time) communication meeting the definition of ACS.

[77] No requests for waivers of ACS obligations from manufacturers of multipurpose equipment have been filed since 2017. CGB granted the request filed in 2017. *See Implementation of Sections 716 and 717 of the Communications Act of 1934, as Enacted by the Twenty-First Century Communications and Video Accessibility Act of 2010*; *Entertainment Software Association*; *Petition for Class Waiver of Sections 716 and 717 of the Communications Act and Part 14 of the Commission's Rules Requiring Access to Advanced Communications Services and Equipment by People with Disabilities*, CG Docket No. 10-213, Order, 32 FCC Rcd 10448, 10449, para. 2 (CGB 2017) (extending a waiver for video game software, as "multipurpose equipment or services, or classes of multipurpose equipment or services that are capable of accessing ACS, but are nonetheless designed primarily for purposes other than the use of ACS").

53. *Design Stage Concerns*. Our rules reflect that the design stage is instrumental to ensure that covered equipment and services are accessible, usable, and compatible.[78] We seek comment as to whether there are gaps in product design, development, and evaluation to meet the needs of people with disabilities, including users with low-incidence or multiple disabilities, as well as those with cognitive or mobility disabilities.[79] Are there sufficient incentives to support research and pilot programs to better serve users with unique needs? If not, what steps can the Commission take to encourage innovative research and robust testing of new technologies?

54. We seek comment on opportunities for improving communications accessibility and usability generally, and the limitations of existing marketplace barriers that might be hindering innovation. We also seek comment on advancements in technologies that may create new opportunities for devices and services to meet the needs of specific populations of people with disabilities, including the need for any changes to the current rules to improve access to communication for the following groups of people with disabilities.

55. *People Who Use Augmentative and Alternative Communications (AAC).* AAC generally includes "[a]ny tool or support that allows a person with a speech-related disability to express themselves, to communicate with others" such as "gesturing; pointing to or looking at letters, words, and images; relying on a personal assistant to repeat one's speech; typing using commercially available assistive digital devices and apps; brain-computer interface technology; and a growing number of other emerging technologies."[80] People who utilize AAC may, in addition to having speech-related disabilities that "limit or make it impossible to physically produce any understandable speech," have other disabilities.[81] Consumer organizations have commented in other proceedings that people who use AAC continue to experience barriers to accessible and usable communication, the current CVAA obligations notwithstanding.[82] We thus seek comment on specific provisions or changes needed, including specific performance objectives, to address the accessibility and usability of covered communications for AAC users. Are AAC-specific performance objectives needed to effectively address the communications needs of AAC users?[83] We also seek comment from industry stakeholders on whether their current processes for development of communication devices take into account the needs of individuals who use AAC. Are there particular technical and engineering considerations at play? We also request comment on what, if any, barriers impact people who use AAC (e.g., any barriers surrounding technologies like synthesized

[78] *See* 47 CFR § 14.20(b) (requiring manufacturers and service providers to consider part 14 performance objectives "at the design stage as early as possible," implement them to the extent achievable, and identify barriers to accessibility and usability as part of such evaluation).

[79] *See generally* Disability Advisory Committee, Report on Recommendations on Best Practices for TRS Users with Multiple Disabilities (Oct. 18, 2024), https://www.fcc.gov/ecfs/document/10312300613204/1.

[80] *See, e.g.*, CommunicationFIRST Comments, CG Docket Nos. 10-213, 03-123, and 23-16, at 1-2 (rec. Feb. 3, 2025) (CommunicationFIRST Comments).

[81] CommunicationFIRST Comments at 3 (describing examples of people who use AAC, including "those who have had disabilities since birth—such as Down syndrome, rare genetic syndromes, cerebral palsy, and autism—as well as those who acquire speech loss at other points in life, for reasons including ALS, Parkinson's disease, stroke, traumatic brain injury, and other conditions or injuries . . .").

[82] *See, e.g.,* CommunicationFIRST Comments at 7-9; American Foundation for the Blind (AFB) Comments, CG Docket No. 10-213, at 3 (rec. Apr. 27, 2026); Accessibility Organizations, CG Docket Nos. 23-161, 10-213, and 03-123, at 4 -5 (rec. Feb. 3, 2025); https://www.fcc.gov/ecfs/search/search-filings/filing/10203485508705; Consortium for Constituents with Disabilities Comments, CG Docket 10-213, at 1 (rec. Sept. 6, 2023), https://www.fcc.gov/ecfs/search/search-filings/filing/1090774259123.

[83] *See IVCS Further Notice*, 39 FCC Rcd 11111-12, 11116, paras. 151-53, 173-75 (asking whether, in the context of IVCS, the Commission should adopt additional performance objectives more specific to speech and cognitive disabilities).

speech, SI, voice recognition, and machine translation and learning) in covered communication technologies.

56. *People with Multiple Disabilities*. In 2011, the Commission clarified that accessibility features for the "full range of functionality within the product line" must be offered, if achievable, to "people with multiple disabilities."[84] Consumer organizations have highlighted the 'pile-on' effects of having several disabilities and functional limitations."[85] The Commission's advisory committees on accessibility have also discussed the needs of people with multiple disabilities.[86] In particular, the Commission's performance objectives in parts 6, 7, and 14 of the rules are "assessed independently," and may therefore fall short for people with a combination of disabilities, who may require something beyond an accessibility solution designed to target a single disability.[87] We seek comment on any barriers to participation and communication for people who experience more than one disability, e.g., people who have both communication and mobility disabilities. Additionally, we seek comment on any rule changes, including specific performance objectives, to advance the accessibility and usability of covered communications for users with multiple disabilities, also including users who are deafblind.

V. REMOVING SPECIFIC BARRIERS TO ACCESSIBILITY

57. In this section, we seek comment on actions the Commission could take to remove barriers to accessibility. We first seek comment on advancing One Device and One Number solutions for persons with disabilities. Consumers with disabilities often face unnecessary complexity in accessing communications due to use of multiple devices or multiple telephone numbers to have effective and functionally equivalent communication. Next, we seek comment on challenges regarding the accessible use of multi-factor authentication. Finally, we seek comment regarding accessible customer service, and the use of Direct Video Calling (DVC) in particular.

58. *One Device.* Consumers with disabilities may require specialized equipment to facilitate access to the communications network. Often there is equipment available in the market that would meet a consumer's needs, but critical functionalities are locked or inoperable. For example, many individuals who are blind or low vision may be unable to use a smartphone due to the difficulty in viewing the smartphone's screen, or individuals with mobility disabilities may find a smartphone too small to manipulate. They may, however, be able to use a tablet. Many currently available tablets include the technology to allow wireless voice communication, but the feature is sometimes deactivated by the manufacturer, which limits one's ability to use a tablet as a replacement for a smartphone. Some consumers with disabilities must therefore use two separate communication devices simultaneously to fulfill basic communication and accessibility needs in a way that is not required of other users.[88]

59. We seek comment on the benefits to manufacturers of limiting the active features and capabilities on multifunction devices, e.g., prohibiting Long Term Evolution (LTE)-enabled tablets from making and receiving voice calls on a wireless carrier's network. Further, we seek comment on how

[84] *See 2011 CVAA Implementation Order*, 26 FCC Rcd 14617, para. 142 & n.368 (2011).

[85] CommunicationFIRST Comments at 3. *See also, e.g.,* AFB Comments, CG Docket No. 24-472, at 3 (rec. Nov. 22, 2024), https://www.fcc.gov/ecfs/search/search-filings/filing/112264909739; Accessibility Advocacy and Research Organizations Comments, GN Docket No. 21-140 et al., at 51-53 (rec. June 7, 2021), https://www.fcc.gov/ecfs/document/106082300102808/1.

[86] *See, e.g.*, *CPAAC June 2026 Report*; Disability Advisory Committee, Identification of Emerging Technologies and Their Associated Accessibility Opportunities and Considerations (Sept. 9, 2021).

[87] *See* 47 CFR §§ 6.3, 7.3, 14.21. For example, section 14.21(b) states that "[t]he term accessible shall mean that: (1) Input, control, and mechanical functions shall be locatable, identifiable, and operable in accordance with each of the following, *assessed independently* . . . ," in the context of ACS. 47 CFR § 14.21(b) (emphasis added).

[88] For example, tablets without wireless voice communications technology do not receive wireless emergency alerts (WEAs).

consumers with disabilities using multiple devices may face barriers or impediments to communication. We also seek comment on solutions for improving options for consumers with disabilities, such as mechanisms for access when a device is technically capable of performing these additional functions, but the functionality has been restricted.

60. We seek comment on how implementing a One Device approach may promote access and functional equivalence for consumers with disabilities, e.g., by providing direct access to voice services (including emergency calling) on tablets, watches, voice-controlled smart speakers, and other devices so that individuals who need a device other than a smartphone for accessible communications can use that device for voice communication, if they prefer. Moreover, we seek comment on what, if any, impacts a One Device policy could have on the TRS Fund as relates to cost savings and efficiencies? Separately, we seek comment on the feasibility and potential burdens of facilitating this policy. What are the costs of implementing the features and capabilities on devices capable of multiple functionalities? Are there solutions for expanding device capabilities to improve accessibility while allowing service providers or manufacturers to maintain and market distinctions between features and functionalities? Generally, we seek comment on whether there are barriers for manufacturers and service providers that may impact implementation of One Device solutions.

61. Finally, we seek comment on whether the Commission has authority to address this issue and whether our rules have otherwise contributed to any limitations that may exist today. Section 716 of the Act is not intended to require a provider or manufacturer of covered services to make every feature and function of every device or service accessible for every disability.[89] We do not believe that this limitation in scope inhibits the Commission from examining the effect of a service provider or equipment manufacturer locking a feature or functionality that supports the accessibility and usability of a device or service. We seek comment on this idea. When a feature, service, or functionality is locked or inoperable, has the provider of a covered service, manufacturer of covered equipment, or provider of networks used with the services impaired or impeded the accessibility of information content when accessibility has been incorporated into that content for transmission?[90] Or should the Commission consider locking a feature, function, or capability as equivalent to installing network features, functions, or capabilities that impede accessibility or usability?[91] Alternatively, should we consider the blocking, locking, or inoperability of any features, services, or functions when evaluating whether covered services and equipment are accessible, usable, and compatible?[92]

62. *One Number.* We also seek comment on establishing a One Number solution to improve the accessibility and usability of TRS, and any impediments or limitations to such an approach. Currently, Video Relay Service (VRS) and IP Relay customers must maintain two telephone numbers; one for TRS calls and one for their wireless device for text-based communications, including RCS, SMS, and RTT. The separation imposes burdens on TRS users that are not experienced by consumers at large. Using multiple phone numbers often complicates daily tasks, because parties trying to contact the TRS user may unintentionally dial the TRS-related number rather than the general number, or vice versa.

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[89] 47 U.S.C. § 617(j).

[90] 47 CFR § 14.20(a)(5) ("Providers of advanced communications services, manufacturers of equipment used with these services, and providers of networks used with these services may not impair or impede the accessibility of information content when accessibility has been incorporated into that content for transmission through such services, equipment or networks."). *See also* 47 U.S.C. § 617(e)(1)(B) (requiring that the Commission adopt such a rule).

[91] 47 CFR § 14.20(a)(4) ("Providers of advanced communications services shall not install network features, functions, or capabilities that impede accessibility or usability."); 47 U.S.C. § 617(d) ("Each provider of advanced communications services has the duty not to install network features, functions, or capabilities that impede accessibility or usability.").

[92] 47 CFR §§ 14.20(a)(2), (3); 14.21.

These misdirected communications can cause significant issues, as automated text-based reminders, confirmations, and authorizations have become central to consumer interactions. This added complexity can also impede emergency communications, where choosing between text-based and relayed communications also is a choice in how location data is shared.

63. The Commission has explored the feasibility of a One Number solution[93] and interoperable video calling,[94] taken steps to encourage VRS providers to help find and implement a solution,[95] and sought comment on interoperability for text and video accessibility for emergency communications.[96] In the *2024 CVAA Biennial Report* to Congress, the Commission reported that consumer organizations "highlight the importance of 'one number solutions' particularly for individuals who are deaf, deafblind, hard of hearing, or have speech disabilities" and that these commenters had urged the Commission to "support the development and implementation of these one number solutions."[97] The *2026 CVAA Biennial Report* similarly notes the issue as an unmet accessibility need identified by consumer organizations.[98]

64. We request comment on the feasibility and potential burdens of operationalizing a One Number approach. Are solutions available or under development by service providers and equipment manufacturers or otherwise?[99] We seek comment on the technical aspects of such a solution. For

[93] The Center on Access Technology at the Rochester Institute of Technology with the support of the MITRE Corporation, a Federally Funded Research and Development Center, and the Commission developed project IRIS to show the feasibility of a one number solution for VRS calls. *See* https://www.rit.edu/accesstechnology/project-iris.

[94] In 2018, the Commission created the Interoperable Video Calling Working Group to assist the North American Numbering Council, a former Commission advisory committee, to explore how to facilitate the provision of interoperable telephone number-based video calling. *FCC Announces New Interoperable Video Calling Working Group of the North American Numbering Council*, CC Docket No. 92-237, Public Notice, 33 FCC Rcd 6346 (WCB 2018). In 2019, the working group delivered its first report detailing a numbering database solution and platform-based solution to allow interoperable video calling. *See* NANC Interoperable Video Calling Working Group, September 2019 Final Report to NANC on Interoperable Video Calling (2019), https://nanc-chair.org/docs/reports/190912NANCInteroperableVideoCallingWorkingGroupFinalReport.docx. In 2020, the working group delivered a report with recommendations on how to implement the numbering database solution for interoperable video calling. *See* NANC Interoperable Video Calling Working Group, July 28, 2020 Final Report to NANC on Interoperable Video Calling (2020), https://nanc-chair.org/docs/IVCFinalReport7-28-20(002).pdf.

[95] *See Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities*; *Structure and Practices of the Video Relay Service Program*, CG Docket Nos. 03-123 and 10-51, Report and Order and Further Notice of Proposed Rulemaking, 38 FCC Rcd 9157, 9184, para. 64 (2023).

[96] *See Facilitating Implementation of Next Generation 911 Services (NG911)*; *Improving 911 Reliability*, PS Docket Nos. 21-479 and 13-75, Further Notice of Proposed Rulemaking, 40 FCC Rcd 2668, 2700-2702, paras. 82-87 (2025) (*2025 NG911 Implementation Notice*).

[97] *Implementation of Sections 716 and 717 of the Communications Act of 1934, as Enacted by the Twenty-First Century Communications and Video Accessibility Act of 2010*, Biennial Report to Congress as Required by the Twenty-First Century Communications and Video Accessibility Act of 2010, 39 FCC Rcd 11289, 11295-6 (2024) (*2024 CVAA Biennial Report*).

[98] *Implementation of Sections 716 and 717 of the Communications Act of 1934, as Enacted by the Twenty-First Century Communications and Video Accessibility Act of 2010*, Biennial Report to Congress as Required by the Twenty-First Century Communications and Video Accessibility Act of 2010, DA 26-1083 (CGB Oct. 8, 2026) (*2026 CVAA Biennial Report*). *See also* AAO Tentative Findings Comments at 11 (suggesting that the Commission should "expressly acknowledge[e] the need for . . . [c]ontinued development of the One Number Solution to reduce fragmentation, streamline communications, and advance more equitable and effective access to emergency services for individuals with disabilities that rely on different telephone numbers to receive voice calls, texts, and relay calls"); Accessibility Organizations Letter at 2 ("We urge the Commission to ensure that this proceeding advances action on unresolved accessibility barriers.").

example, would it require allowing accessibility apps to access a telecommunications device's native dialer or other built-in communication functionality? How might a One Number solution support one number for VRS users to make video calls, receive text, and access and provide location to emergency services? What, if any, impacts could a One Number policy have on the TRS Fund as relates to cost savings and efficiencies? We also seek comment on how a One Number solution would promote access and functional equivalence for consumers with disabilities. Finally, we invite comment on the Commission's legal authority to make such changes. Have the existing rules contributed to the limitations that exist today?

65. *Multi-factor Authentication (MFA).* Telecommunications and ACS providers have continued to advance the security of their networks and users, including installing stronger protections to safeguard consumer privacy and account security. They also need to comply with FCC security and other applicable requirements, including changes to how consumers can authenticate their identities to access communications services and devices and their related accounts. While MFA may provide a more secure authentication path that protects both the larger system and consumers' sensitive information, these processes often require users to navigate between multiple apps or devices, usually within a specific time range. Depending on the authentication method used, this requirement can present challenges for people with certain disabilities, including people with multiple disabilities.

66. For example, blind or low-vision users may not be able to identify visual Completely Automated Public Turing Test to Tell Computers and Humans Apart (CAPTCHA) methods (e.g., "select all the trains").[100] People with limited or no manual dexterity often cannot use plug-in security keys, key fobs, and PIV cards, and may not be able to hold a device steady for long enough to scan a QR code. Screen reader users, i.e., users who are blind or low vision, may face a barrier when required to simultaneously receive and relay security codes, either because using screen readers while on a voice call may not be possible, or because the authentication process times out before the code can be retrieved. Verification via voice call may also present a barrier for people who are deaf or hard of hearing.[101] Similarly, time limits may be challenging to meet for customers with multiple disabilities, people with intellectual disabilities, or people with information-processing limitations. Individuals using TRS may also need additional time to complete security measures. Biometric authentication, such as face ID, fingerprint scanning, or voice recognition, may be preferable for some consumers with disabilities, such as people with limited manual dexterity, but can create a barrier for others. For example, voice-based biometrics may present a barrier for people who are deaf or hard of hearing, or people with speech disabilities.[102] Inflexible MFA requirements may leave some customers with disabilities unable to meet the requirements to access their own devices or accounts, and we note that a number of RDAs and complaints have alleged inaccessible MFA.[103] In addition, commenters raised the issue of MFA as an

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[99] For example, has the development of automated text-to-speech and automatic speech recognition for IP Relay users reduced the need for consumers to provide two separate telephone numbers, through the use of services such as call forwarding?

[100] *See, e.g.*, AAO Tentative Findings Comments at 13.

[101] *See* Letter from Neil Snyder, Founder and Principal, Americans for Hearing and Communication, to Marlene H. Dortch, Secretary, FCC, CG Docket Nos. 10-213 and 03-123, GN Docket No. 21-140, at 2 (filed Oct. 19, 2026) (AHC Letter).

[102] *See* AHC Letter at 2.

[103] *See, e.g.*, *2026 CVAA Biennial Report* at 19, para. 42; *2026 CVAA Tentative Findings Public Notice* at 13-14, paras. 36-37.

accessibility barrier in the 2026 Biennial Report to Congress comment cycles, as well as in IVCS proceedings.[104]

67. By this *Notice*, we seek comment on the accessibility of security and authentication processes for covered devices and services. Are there specific consumer access issues that arise with authentication processes and the usage of ACS services and covered equipment, whether fixed or mobile that the FCC should consider? How does the type of device or service used impact the ability to access and complete security and authentication processes? How do these accessibility issues affect consumer usage? What are the implications for not rectifying these issues? What, if any, aspects of access can be rectified, and by what means?

68. We seek comment on whether alternative identity and security verification methods are available or possible to address accessibility barriers while maintaining critical security protections. We request comment on how to ensure people who are deaf or hard of hearing, blind, people with cognitive disabilities, and people with dexterity and mobility disabilities can access and use common communication security measures. We seek comment specifically on the accessibility of MFA. We also seek comment on authentication methods that rely solely on a single communication channel, such as voice phone calls[105] or device-based authentication methods, such as QR-code scanning. What are the limitations and benefits of these methods?

69. We also seek comment on the scope of FCC authority to implement changes to the authentication processes for covered communications services and devices. Should we consider such security and authentication measures an inherent part of a covered provider's services or a covered manufacturer's equipment? If so, should the legal analysis focus on whether the service is accessible to and usable by people with disabilities, unless not achievable? Or should we consider security and authentication measures as network features, functions, or capabilities that impede accessibility or usability?[106] Would the availability of alternative, accessible identity and security measures affect how we classify the services? Alternatively, should any analysis focus on whether these security and authentication processes impair or impede the accessibility of information content?[107] If so, how should we analyze the distinction? If a user is otherwise able to access and use a covered communications service or equipment, except when a security or authentication measure such as MFA is required, is that an action that impairs or impedes the accessibility of information content that had been incorporated into the content for transmission?

70. *Accessible Customer Service.* As the Commission considers changes to improve customer service communications,[108] we seek comment on any changes needed under the current rules

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[104] *See, e.g.*, *2026 CVAA Tentative Findings Public Notice* at 13-14, paras. 36-37; AAO Tentative Findings Comments at 12-13; *2026 CVAA Biennial Report* at 10, para. 20; United Spinal Association Comments Appendix at 1-2 (rec. Feb 3, 2025), https://www.fcc.gov/ecfs/search/search-filings/filing/10203320415074.

[105] *See* AHC Letter at 2.

[106] *See* 47 U.S.C. § 617(d) (providers of ACS have a duty not to install network features, functions, or capabilities that impede accessibility or usability); 47 CFR § 14.20(a)(4) (prohibiting providers of ACS from installing network features, functions, or capabilities that impede accessibility or usability).

[107] *See* 47 CFR § 14.20(a)(5) ("Providers of advanced communications services, manufacturers of equipment used with these services, and providers of networks used with these services may not impair or impede the accessibility of information content when accessibility has been incorporated into that content for transmission through such services, equipment or networks."). *See also* 47 U.S.C. § 617(e)(1)(B) (requiring that the Commission adopt such a rule); *2011 CVAA Implementation Order*, 26 FCC Rcd at 14599-14600, paras. 101-103 (adopting section 14.20(a)(5)); 47 CFR § 14.21(b)(1)(x) (defining "accessible" as requiring "at least one mode that minimizes the cognitive, memory, language, and learning skills required of the user").

[108] *See, e.g.*, *Improving Customer Service and Protecting Consumers Through Onshoring et al.*, CG Docket No. 26-52 et al., Notice of Proposed Rulemaking in CG Docket No. 26-52; Tenth Further Notice of Proposed Rulemaking (continued….)

regarding the requirement for covered manufacturers and service providers to ensure the accessibility of information and documentation that they provide to customers.[109] Covered companies are generally required to ensure that individuals with disabilities can access, at no additional cost, call centers and customer support regarding both the product generally and the accessibility features of the product, within certain limitations.[110] We observe that multiple RDAs in recent years have alleged that customer service was inaccessible or unusable for consumers with disabilities, usually alleging that customer service staff either lack training regarding accessibility features on their devices, or fail to interact effectively with customers who have disabilities.[111]

71. In preparing the 2026 Biennial Report to Congress, the Commission heard from commenters that "inaccessible customer service remains a persistent accessibility barrier."[112] Consumer organizations urged the Commission to strengthen requirements ensuring accessible customer service, including across phone, web, apps, in-person interactions, and alternative formats.[113] In a prior Notice of Inquiry on "Strengthening Customer Service in the Communications Industry,"[114] commenters emphasized the need for multiple modes for customer service, including accessible live phone support, well-trained agents capable of resolving accessibility issues, and accessible digital tools.[115]

72. For users of American Sign Language (ASL), Direct Video Calling (DVC)[116] enables conversations between two or more callers using ASL without the presence of any intermediary. Using DVC, sign-language users can place video calls to customer support lines and communicate directly with support staff who are fluent in ASL.[117] The Commission has encouraged public and private sector entities to offer DVC as an option for ASL users to communicate with call centers, including emergency services.[118] Consumer organizations continue to highlight the need for DVC as an available option for customer service centers.[119]

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in CG Docket No. 17-59; Further Notice of Proposed Rulemaking in CG Docket No. 02-278; and Third Further Notice of Proposed Rulemaking in CG Docket No. 22-2, FCC 26-16 (Mar. 27, 2026) (*Onshoring NPRM*).

[109] *See, e.g.*, 47 CFR §§ 6.11(a), 7.11(a), 14.20(d).

[110] *Id.*

[111] *See, e.g.*, *2026 CVAA Biennial Report* at 18-19, paras. 41-43; *2026 CVAA Tentative Findings Public Notice* at 13-14, paras. 35-36; *2024 CVAA Biennial Report* at 12-13, paras. 27, 30; *see also ViaTalk, LLC*; *Informal Complaint Request Access to Telecommunications Services*, EB-TCD-21-0032021, Order, 36 FCC Rcd 12968, 12975-76, paras. 28-24 (finding the provider failed to ensure that individuals with disabilities have access to information, including product support communications, that the entity provides to its customers).

[112] *See, e.g.*, AAO Tentative Findings Comments at 11-12; AFB Comments at 3; Disability Belongs Comments, CG Docket No. 10-213, at 5-6 (rec. Apr. 27, 2026); *2026 CVAA Biennial Report* at 12-13, para. 26.

[113] *See, e.g.*, *2026 CVAA Biennial Report* at 13, para. 28; *2026 CVAA Tentative Findings Public Notice* at 8, para. 21; AAO Tentative Findings Comments at 11-12.

[114] *Strengthening Customer Service in the Communications Industry*, CG Docket No. 24-472, Notice of Inquiry, 39 FCC Rcd 11796 (2024).

[115] *See, e.g.*, AFB Comments, CG Docket No. 24-472 (rec. Nov. 22, 2024), https://www.fcc.gov/ecfs/search/search-filings/filing/112264909739.

[116] *See* 47 C.F.R. § 64.601(a)(16) (referring to this service as "direct video customer support," defined as a "telephone customer support operation that enables callers with hearing or speech disabilities to engage in real-time direct video communication in ASL with ASL speakers in a call center operation.").

[117] *See, e.g.*, AAO Comments, CG Docket No. 10-213, at 8-9 (rec. Apr. 27, 2026).

[118] *See Implementation of the National Suicide Hotline Improvement Act of 2018*, WC Docket No. 18-336, Second Report and Order, 36 FCC Rcd 16901, 16918-19, para. 29 (2018) (encouraging the development and implementation of direct communications solutions for people with disabilities for 988); *Direct Video Calling*
(continued….)

73. We seek comment on the accessibility of customer service call centers operated by entities under the Commission's jurisdiction. Are there innovations that the industry has implemented that can be leveraged or replicated to improve accessibility, e.g., designated customer service teams to provide customized support to people with disabilities? We also seek comment on whether customer service and technical support personnel sufficiently implement accessibility and usability requirements, and we seek comment on what, if any, modern communications solutions may enhance the accessibility, effectiveness, and efficiency of call centers. More specifically, we seek comment on accessibility barriers in customer service systems that rely on automated chat interfaces or phone systems. Are there any negative impacts off-shoring has had on providing accessible customer service and technical support?[120] We seek comment on the effectiveness of DVC in customer service environments where it is currently used, and the feasibility of broader implementation.[121] Finally, we seek comment on the FCC's authority for any potential actions with regard to call center accessibility.[122]

VI. PROCEDURAL MATTERS

74. *Regulatory Flexibility Act.* The Regulatory Flexibility Act of 1980, as amended (RFA),[123] requires that an agency prepare a regulatory flexibility analysis for notice-and-comment rulemaking proceedings, unless the agency certifies that "the rule will not, if promulgated, have a significant economic impact on a substantial number of small entities."[124] Accordingly, the Commission has prepared an Initial Regulatory Flexibility Analysis (IRFA), concerning potential rule and policy changes contained in this *Notice*. The IRFA is set forth in Appendix B. The Commission invites the general public, in particular small businesses, to comment on the IRFA. Comments must be filed by the deadlines for comments on the *Notice* indicated on the first page of this document, and must also have a separate and distinct heading designating them as responses to the IRFA.

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Enhances Accessibility of Consumer Call Centers, CG Docket Nos. 03-123 and 10-51, Public Notice, 39 FCC Rcd 13628 (CGB 2024); *see also Facilitating Implementation of Next Generation 911 Services*; *Improving 911 Reliability*, PS Docket Nos. 21-479 and 13-75, Second Report and Order and Second Further Notice of Proposed Rulemaking, FCC 26-39, paras. 190-199 (2026) (seeking comment on a framework for DVC-to-911 calls).

[119] *See, e.g.*, *2026 CVAA* Biennial *Report* at 14, para. 30; *2026 CVAA Tentative Findings Public Notice* at 9-10, para. 25. *See also, e.g.,* Telecommunications for the Deaf and Hard of Hearing, Inc. and National Association of the Deaf Reply, CG Docket Nos. 10-51 and 03-123, at 2 (rec. June 20, 2023) (filing as Accessibility Advocacy Organizations and explaining that DVC enables real-time video communication between customers and customer service representatives, facilitating effective communication for individuals who rely on sign language, text-based communication, or visual aids, a position echoed by many commenters); Letter from Karen Peltz Strauss, KPS Collaborative Solutions, to Marlene H. Dortch, Secretary, FCC, GN Docket No. 21-140, at 1 (filed Feb. 8, 2023) (noting the "[r]ecognition of American Sign Language as an essential form of communication for people who rely on this as their primary language, including when calling business and government call centers" as a "disability access priority").

[120] *See Onshoring NPRM*.

[121] *See* Accessibility Organizations Letter at 2 ("The Commission should consider not only whether a feature exists, but whether people can use it reliably and effectively in real-world circumstances.").

[122] *See, e.g.*, 47 U.S.C. § 255 (requiring manufacturers and service providers to ensure that telecommunications services, equipment, and customer premises equipment are accessible to and usable by individuals with disabilities, if readily achievable); 47 U.S.C. § 617 (requiring providers of ACS to ensure that such services are accessible to and usable by individuals with disabilities, unless not achievable).

[123] 5 U.S.C. §§ 601 *et seq*., as amended by the Small Business Regulatory Enforcement and Fairness Act (SBREFA), Pub. L. No. 104-121, 110 Stat. 847 (1996).

[124] *Id.* § 605(b).

75. *Paperwork Reduction Act Analysis*. This document may contain proposed new or modified information collections. The Commission, as part of its continuing effort to reduce paperwork burdens, invites the general public and the Office of Management and Budget (OMB) to comment on any information collections contained in this document, as required by the Paperwork Reduction Act of 1995.[125] In addition, pursuant to the Small Business Paperwork Relief Act of 2002,[126] we seek specific comment on how we might further reduce the information collection burden for small business concerns with fewer than 25 employees.

76. *Comments.* Pursuant to sections 1.415 and 1.419 of the Commission's rules, 47 CFR §§ 1.415, 1.419, interested parties may file comments on or before the dates indicated on the first page of this document. Comments may be filed using the Commission's Electronic Comment Filing System (ECFS).

- Electronic Filers: Comments may be filed electronically using the Internet by accessing the ECFS: https://www.fcc.gov/ecfs.
- Paper Filers: Parties who choose to file by paper must file an original and one copy of each filing.
  - Filings can be sent by hand or messenger delivery, by commercial courier, or by U.S. Postal Service. **All filings must be addressed to the Secretary, Federal Communications Commission.**
  - Hand-delivered or messenger-delivered paper filings for the Commission's Secretary are accepted between 8:00 a.m. and 4:00 p.m. by the FCC's mailing contractor at 9050 Junction Drive, Annapolis Junction, MD 20701. All hand deliveries must be held together with rubber bands or fasteners. Any envelopes and boxes must be disposed of before entering the building.
  - Commercial courier deliveries (any deliveries not by the U.S. Postal Service) must be sent to 9050 Junction Drive, Annapolis Junction, MD 20701.
  - Filings sent by U.S. Postal Service First-Class Mail, Priority Mail, and Priority Mail Express must be sent to 45 L Street NE, Washington, DC 20554.

77. *People with Disabilities*: To request materials in accessible formats for people with disabilities (Braille, large print, electronic files, audio format), send an e-mail to fcc504@fcc.gov or call the Consumer and Governmental Affairs Bureau at 202-418-0530.

78. *Ex Parte Rules.* The proceeding this Notice initiates shall be treated as a "permit-but-disclose" proceeding in accordance with the Commission's *ex parte* rules.[127] Persons making *ex parte* presentations must file a copy of any written presentation or a memorandum summarizing any oral presentation within two business days after the presentation (unless a different deadline applicable to the Sunshine period applies). Persons making oral *ex parte* presentations are reminded that memoranda summarizing the presentation must (1) list all persons attending or otherwise participating in the meeting at which the *ex parte* presentation was made, and (2) summarize all data presented and arguments made during the presentation. If the presentation consisted in whole or in part of the presentation of data or arguments already reflected in the presenter's written comments, memoranda or other filings in the proceeding, the presenter may provide citations to such data or arguments in his or her prior comments, memoranda, or other filings (specifying the relevant page and/or paragraph numbers where such data or arguments can be found) in lieu of summarizing them in the memorandum. Documents shown or given to Commission staff during *ex parte* meetings are deemed to be written *ex parte* presentations and must

[125] 44 U.S.C. §§ 3501-3521.

[126] *Id.* § 3506(c)(4).

[127] 47 CFR § 1.1200 *et seq.*

be filed consistent with section 1.1206(b). In proceedings governed by section 1.49(f) or for which the Commission has made available a method of electronic filing, written *ex parte* presentations and memoranda summarizing oral *ex parte* presentations, and all attachments thereto, must be filed through the electronic comment filing system available for that proceeding, and must be filed in their native format (e.g., .doc, .xml, .ppt, searchable .pdf). Participants in this proceeding should familiarize themselves with the Commission's *ex parte* rules.

79. *Providing Accountability Through Transparency Act*: Consistent with the Providing Accountability Through Transparency Act, Public Law 118-9, a summary of this document will be available on https://www.fcc.gov/proposed-rulemakings.

80. *Additional Information*. For further information about this *Notice*, contact Stephen Wang, Disability Rights Office, Consumer and Governmental Affairs Bureau, at Stephen.Wang@fcc.gov.

VII. ORDERING CLAUSES

81. Accordingly, IT IS ORDERED that, pursuant to sections 1, 2, 225, 251, 255, 716, 717, and 718 of the Communications Act of 1934, as amended, 47 U.S.C. §§ 151, 152, 225, 251, 255, 617, 618, and 619 the foregoing Notice of Proposed Rulemaking IS ADOPTED.[128]

82. IT IS FURTHER ORDERED that, pursuant to applicable procedures set forth in sections 1.415 and 1.419 of the Commission's Rules, 47 CFR §§ 1.415, 1.419, interested parties may file comments on this Notice of Proposed Rulemaking on or before 30 days after publication in the Federal Register, and reply comments on or before 60 days after publication in the Federal Register.

83. IT IS FURTHER ORDERED that the Commission's Consumer and Governmental Affairs Bureau, Reference Information Center, SHALL SEND a copy of the Notice of Proposed Rulemaking including the Initial Regulatory Flexibility Analysis, to the Chief Counsel for the Small Business Administration (SBA) Office of Advocacy.

FEDERAL COMMUNICATIONS COMMISSION

Marlene H. Dortch
Secretary

[128] Pursuant to Executive Order 14215, 90 Fed. Reg. 10447 (Feb. 24, 2025), this regulatory action has been determined to be not significant under Executive Order 12866, 58 Fed. Reg. 51735 (Oct. 4, 1993).

APPENDIX A

Proposed Rules

For the reasons discussed in the document, the Federal Communications Commission proposes to amend 47 CFR parts 6, 7, and 14 as follows:

PART 6—ACCESS TO TELECOMMUNICATIONS SERVICE, TELECOMMUNICATIONS EQUIPMENT AND CUSTOMER PREMISES EQUIPMENT BY PERSONS WITH DISABILITIES

1. The authority citation for part 6 continues to read as follows:

Authority: 47 U.S.C. 151-154, 208, 255, and 303(r).

2. Amend § 6.3 by revising paragraphs (a)(3) and (b)(5) to read as follows:

§ 6.3 Definitions.

(a) * * *

(3) *Real-Time Text*. Voice communication services subject to this part that are provided over wireless IP facilities and handsets and other text-capable end user devices used with such service that do not themselves provide TTY functionality, may provide TTY connectability and signal compatibility pursuant to paragraphs (b)(3) and (4) of this section, or support real-time text communications, in accordance with part 67 of this chapter.

(b) * * *

(5) *TTY Support Exemption*. Voice communication services subject to this part that are provided over wireless IP facilities and equipment used with such services are not required to provide TTY connectability and TTY signal compatibility if such services and equipment support real-time text, in accordance with part 67 of this chapter.

* * * * *

PART 7—ACCESS TO VOICEMAIL AND INTERACTIVE MENU SERVICES AND EQUIPMENT BY PEOPLE WITH DISABILITIES

3. The authority citation for part 7 continues to read as follows:

Authority: 47 U.S.C. 151-154, 208, 255, and 303(r).

4. Amend § 7.3 by:

a. Revising paragraphs (a) and (b); and
b. Removing and reserving paragraphs (c), (d), (f) through (l), (n), and (o)
The revision reads as follows:

§ 7.3 Definitions.

(a) The terms *accessible*, *customer premises equipment*, *disability*, *manufacturer*, *peripheral devices*, *readily achievable*, *specialized customer premises equipment*, *telecommunications equipment*, *telecommunications service*, *text-capable end user device*, and *usable* shall have the same meanings as in section 6.3 of this chapter.

(b) The term *compatibility* shall mean compatible with peripheral devices and specialized customer premises equipment commonly used by individuals with disabilities to achieve accessibility to voicemail and interactive menus. Service providers and equipment manufacturers subject to this section shall also comply with section 6.3(b)(1) through (b)(5) of this chapter.

* * * * *

PART 14 – ACCESS TO ADVANCED COMMUNICATIONS SERVICES AND EQUIPMENT BY PEOPLE WITH DISABILITIES

5. The authority citation for part 14 continues to read as follows:

Authority: 47 U.S.C. 151-154, 255, 303, 403, 503, 617, 618, 619 unless otherwise noted.

6. Amend § 14.1 by revising the introductory text to read as follows:

§ 14.1 Applicability.

Except as provided in §§ 14.2, 14.3, 14.5, 14.30, and 14.60 of this chapter, the rules in this part apply to:

* * * * *

7. Amend § 14.2 by revising paragraph (c) to read as follows:

§ 14.2 Limitations.

* * * * *

(c) The requirements of subpart C of this part shall not apply to any equipment or services, including interconnected VoIP service, that are subject to the requirements of section 255 on the day before the date of enactment of the Twenty-First Century Communications and Video Accessibility Act of 2010. Such services and equipment shall remain subject to the requirements of section 255 of this title.

§ 14.30 [Amended]

8. Amend § 14.30 by removing and reserving paragraphs (b) and (c).

9. Amend § 14.31 by revising paragraph (b)(2) to read as follows:

§ 14.31 Recordkeeping.

* * * * *

(b) * * *

(2) The certificate shall identify the name and contact details of the person or persons within the company that are authorized to resolve complaints alleging violations of the Commission's accessibility rules and sections 255, 716, and 718 of the Act, and the agent designated for service pursuant to § 14.35(b) of this subpart and provide contact information for this agent. Contact information shall include, for the manufacturer or the service provider, a name or department designation, business address, telephone number, and email address.

* * * * *

10. Amend § 14.32 by revising paragraphs (a) and (b)(5) to read as follows:

§ 14.32 Consumer Dispute Assistance.

(a) A consumer or any other party may transmit a Request for Dispute Assistance to the Consumer and Governmental Affairs Bureau by any reasonable means.

(b) * * *

(5) The Requester's preferred format or method of response to its Request for Dispute Assistance by CGB or the manufacturer or service provider;

* * * * *

11. Amend § 14.34 by:

a. Revising paragraph (b)(6); and
b. Removing and reserving paragraph (c)
The revision reads as follows:

§ 14.34 Informal complaints; form, filing, content, and consumer assistance.

* * * * *

(b) * * *

(6) The complainant's preferred format or method of response to the complaint by the Commission; and

* * * * *

§ 14.36 [Amended]

12. Amend § 14.36 by removing and reserving paragraph (b)(1)(vi).

13. Revise § 14.38 to read as follows:

§ 14.38 Formal complaints.

Formal complaint proceedings alleging a violation of 47 U.S.C. 255, 617, or 619, or parts 6, 7, or 14 of this chapter, shall be governed by the formal complaint rules in subpart E of part 1, §§ 1.720-1.740.

APPENDIX B

Initial Regulatory Flexibility Analysis

1. As required by the Regulatory Flexibility Act of 1980, as amended (RFA),[129] the Federal Communications Commission (Commission) has prepared this Initial Regulatory Flexibility Analysis (IRFA) of the policies and rules proposed in the *Notice of Proposed Rulemaking* (*Notice*) assessing the possible significant economic impact on a substantial number of small entities. The Commission requests written public comments on this IRFA. Comments must be identified as responses to the IRFA and must be filed by the deadlines for comments specified on the first page of the *Notice*. The Commission will send a copy of the *Notice*, including this IRFA, to the Chief Counsel for the Small Business Administration (SBA) Office of Advocacy.[130] In addition, the *Notice* and IRFA (or summaries thereof) will be published in the Federal Register.[131]

A. Need for, and Objectives of, the Proposed Rules

2. The Commission believes that rapid advances in communications technology continue to reshape how consumers interact with modern communications services and devices and have introduced new, often complex barriers for people with disabilities. With this *Notice*, the Commission generally seeks comment on whether the Commission's existing accessibility framework remains sufficiently flexible, technology-neutral, and reflective of current marketplace realities, and the extent to which any changes to the accessibility framework are necessary. For that reason, the Commission proposes to streamline parts 6, 7, and 14 of the rules and eliminate provisions that it deems duplicative, outdated, superfluous, or unnecessarily burdensome.[132]

3. Specifically, the Commission seeks comment on modernizing its accessibility rules to ensure that they are technology-neutral and forward-looking, reflect the current marketplace, and provide flexibility for developers to innovate and incorporate accessibility. The *Notice* seeks comment on whether there are marketplace barriers that may impede the emergence of novel accessibility solutions or access to advanced communications services, whether newer communications platforms and products consistently incorporate accessibility features, and opportunities for improving communications accessibility and usability generally. Finally, the Commission seeks comment on addressing specific barriers to accessibility that have been identified in other proceedings.

B. Legal Basis

4. The proposed action is authorized pursuant to sections 1, 2, 225, 251, 255, 716, 717, and 718 of the Communications Act of 1934, as amended, 47 U.S.C. §§ 151, 152, 225, 251, 255, 617, 618, and 619.

C. Description and Estimate of the Number of Small Entities to Which the Proposed Rules Will Apply

5. The RFA directs agencies to provide a description of and, where feasible, an estimate of the number of small entities that may be affected by the proposed rules, if adopted.[133] The RFA generally defines the term "small entity" as having the same meaning as the terms "small business," "small

[129] 5 U.S.C. §§ 601 *et seq*., as amended by the Small Business Regulatory Enforcement and Fairness Act (SBREFA), Pub. L. No. 104-121, 110 Stat. 847 (1996).

[130] *Id.* § 603(a).

[131] *Id.*

[132] *See* 47 CFR pts. 6, 7, 14.

[133] 5 U.S.C. § 603(b)(3).

organization," and "small governmental jurisdiction."[134] In addition, the term "small business" has the same meaning as the term "small business concern" under the Small Business Act.[135] A "small business concern" is one which: (1) is independently owned and operated; (2) is not dominant in its field of operation; and (3) satisfies any additional criteria established by the SBA.[136] The SBA establishes small business size standards that agencies are required to use when promulgating regulations relating to small businesses; agencies may establish alternative size standards for use in such programs, but must consult and obtain approval from SBA before doing so.[137]

6. Our actions, over time, may affect small entities that are not easily categorized at present. We therefore describe three broad groups of small entities that could be directly affected by our actions.[138] In general, a small business is an independent business having fewer than 500 employees.[139] These types of small businesses represent 99.9% of all businesses in the United States, which translates to 34.75 million businesses.[140] Next, "small organizations" are not-for-profit enterprises that are independently owned and operated and not dominant in their field.[141] While we do not have data regarding the number of non-profits that meet that criteria, over 99 percent of nonprofits have fewer than 500 employees.[142] Finally, "small governmental jurisdictions" are defined as cities, counties, towns, townships, villages, school districts, or special districts with populations of less than fifty thousand.[143] Based on the 2022 U.S. Census of Governments data, we estimate that at least 48,724 out of 90,835 local government jurisdictions have a population of less than 50,000.[144]

7. The rules proposed in the *Notice* will apply to small entities in the industries identified in the chart below by their six-digit North American Industry Classification System (NAICS)[145] codes and

[134] *Id.* § 601(6).

[135] *Id.* § 601(3) (incorporating by reference the definition of "small-business concern" in the Small Business Act, 15 U.S.C. § 632). Pursuant to 5 U.S.C. § 601(3), the statutory definition of a small business applies "unless an agency, after consultation with the Office of Advocacy of the Small Business Administration and after opportunity for public comment, establishes one or more definitions of such term which are appropriate to the activities of the agency and publishes such definition(s) in the Federal Register."

[136] 15 U.S.C. § 632.

[137] 13 CFR § 121.903.

[138] 5 U.S.C. § 601(3)-(6).

[139] *See* SBA, Office of Advocacy, *Frequently Asked Questions About Small Business* (July 23, 2024), https://advocacy.sba.gov/wp-content/uploads/2024/12/Frequently-Asked-Questions-About-Small-Business_2024-508.pdf.

[140] *Id.*

[141] 5 U.S.C. § 601(4).

[142] *See* SBA, Office of Advocacy, *Small Business Facts, Spotlight on Nonprofits* (July 2019), https://advocacy.sba.gov/2019/07/25/small-business-facts-spotlight-on-nonprofits/.

[143] 5 U.S.C. § 601(5).

[144] *See* U.S. Census Bureau, 2022 Census of Governments, Organization Tables, https://www.census.gov/data/tables/2022/econ/gus/2022-governments.html, tables 1-11.

[145] The North American Industry Classification System (NAICS) is the standard used by Federal statistical agencies in classifying business establishments for the purpose of collecting, analyzing, and publishing statistical data related to the U.S. business economy. *See* www.census.gov/NAICS for further details regarding the NAICS codes identified in this chart.

corresponding SBA size standard.[146] Where available, we also provide additional information regarding the number of potentially affected entities in the industries identified below.

Table 1. 2022 U.S. Census Bureau Data by NAICS Code

Regulated Industry (Footnotes specify potentially affected entities within a regulated industry where applicable)	NAICS Code	SBA Size Standard	Total Firms[147]	Total Small Firms[148]	% Small Firms
Telephone Apparatus Manufacturing[149]	334210	1,250 employees	155	136	87.74%
Media Streaming Distribution Services, Social Networks, and Other Media Networks and Content Providers[150]	516210	$47 million	5,217	3,673	70.40%
Wired Telecommunications Carriers[151]	517111	1,500 employees	3,403	3,027	88.95%
Wireless Telecommunications	517112	1,500	1,184	1,081	91.30%

[146] The size standards in this chart are set forth in 13 CFR § 121.201, by six digit North American Industrial Classification System (NAICS) code.

[147] *U.S. Census Bureau*, "*Selected Sectors: Employment Size of Firms for the U.S.: 2022*." Economic Census, ECN Core Statistics Economic Census: Establishment and Firm Size Statistics for the U.S., Table EC2200SIZEEMPFIRM, 2025.

[148] *Id.*

[149] Affected Entities in this industry include Multi-Line Telephone System Manufacturers Importers Sellers or Lessors.

[150] Affected Entities in this industry include Cable Broadcasting Networks, Cable Television Networks, Satellite Television Networks, and Subscription Television Networks.

[151] Affected Entities in this industry include Cable Television Distribution Services, Carrier RespOrgs, Competitive Access Providers, Cable Companies and Systems (Rate Regulation), Cable System Operators (Telecom Act Standard), Competitive Local Exchange Carriers (CLECs), Competitive Local Service Providers, Direct Broadcast Satellite (DBS), Facilities-Based Carriers (International Telecom Carriers), Home Satellite Dish (HSD) Service, Incumbent Local Exchange Carriers (Incumbent LECs), Interexchange Carriers (IXCs), Local Exchange Carriers (LECs), Open Video Systems, Operator Service Providers (OSPs), Operators of Common Carrier Non-Common Carrier Undersea Cable Systems, Other Toll Carriers, Providers of International Telecommunications Transmission Facilities, Satellite Master Antenna Television (SMATV) Systems aka Private Cable Operators (PCOs), and Wired Broadband Internet Access Service Providers.

Regulated Industry (Footnotes specify potentially affected entities within a regulated industry where applicable)	NAICS Code	SBA Size Standard	Total Firms[147]	Total Small Firms[148]	% Small Firms
Carriers (except Satellite)[152]		employees			
Telecommunications Resellers[153]	517121	1,500 employees	955	847	88.69%
All Other Telecommunications[154]	517810	$40 million	1,673	1,007	60.19%

Table 2. Telecommunications Service Provider Data

2025 Universal Service Monitoring Report Telecommunications Service Provider Data [155] (Data as of December 2024)	SBA Size Standard (1500 Employees)		
Affected Entity	Total # FCC Form 499A Filers	Small Firms	% Small Entities
Competitive Local Exchange Carriers (CLECs)[156]	4,049	3,853	95.16

[152] Affected Entities in this industry include 1.4 GHz Band Licensees, 1670–1675 MHz Services, 2.3 GHz Wireless Communications Services, 218-219 MHz Service, 220 MHz Radio Service – Phase I and Phase II, 3650-3700 MHz Band, 39 GHz Service, 600 MHz Band, 700 MHz Guard Band Licensees, Advanced Wireless Services - AWS Services, Aeronautical en route Services, Aeronautical Fixed Radio Services, Air-Ground Radiotelephone Services, Aviation and Marine Radio Services, Broadband Personal Communications Service, Broadband Radio Service and Educational Broadband Service, Carrier RespOrgs, Cellular Radiotelephone Service, Experimental Radio Service (Other Than Broadcast), Fixed Microwave Services, Future 24 GHz Licensees, Government Transfer Bands, Incumbent 24 GHz Licensees, Local Multipoint Distribution Service (LMDS), Location and Monitoring Service (LMS), Low Power Auxiliary Station (LPAS) Licensees, Lower 700 MHz Band Licenses, Marine Radio Services, Multichannel Video Distribution and Data Service (MVDDS), Multiple Address Systems, Narrowband Personal Communications Services, Offshore Radiotelephone Service, Paging Services, Personal Radio Services, Private Land Mobile Radio - 900 MHz Band, Private Land Mobile Radio Licensees (PLMR), Public Safety Radio Licensees, Rural Radiotelephone Service, Specialized Mobile Radio Licenses, Upper 700 MHz Band Licenses, Wireless Broadband Internet Access Service Providers, Wireless Carriers and Service Providers, Wireless Communications Services, Wireless Telephony.

[153] Affected Entities in this industry include 800 and 800-Like Service Subscribers, Carrier RespOrgs, IMTS Resale Carriers, Local Resellers, Payphone Service Providers, Prepaid Calling Card Providers, Toll Resellers, and Wireless Resellers.

[154] Affected Entities in this industry include Earth Stations (except Satellite Telecommunications Carriers), Internet Service Providers (Non-Broadband), Non-Carrier RespOrgs, Non Licensee Owners of Towers and Other Infrastructure, Online Access Service Providers, Radar Station Operations, Satellite Telemetry Operations, Satellite Tracking Stations, Telecommunications Relay Service (TRS) Providers, Telemetry and Tracking System Operations and VoIP Service Providers (via Client-Supplied Telecommunications Connections).

[155] Federal-State Joint Board on Universal Service, Universal Service Monitoring Report at 25, Table 1.12 (2025), https://docs.fcc.gov/public/attachments/DOC-418505A1.pdf.

[156] Affected Entities in this industry include all reporting local competitive service providers.

2025 Universal Service Monitoring Report Telecommunications Service Provider Data [155] (Data as of December 2024)	SBA Size Standard (1500 Employees)		
Affected Entity	**Total # FCC Form 499A Filers**	**Small Firms**	**% Small Entities**
Incumbent Local Exchange Carriers (Incumbent LECs)	1,175	920	78.30
Interconnected VOIP	2,712	2,643	97.46
Interexchange Carriers (IXCs)	112	92	82.14
Local Exchange Carriers (LECs)[157]	5,224	4,773	91.37
Local Resellers	253	242	95.65
Non-Interconnected VOIP	239	233	97.49
Operator Service Providers (OSPs)	26	24	92.31
Other Toll Carriers	72	69	95.83
Toll Resellers	402	388	96.52
Telecommunications Resellers	655	630	96.18
Wired Telecommunications Carriers[158]	4,971	4,531	91.15
Wireless Telecommunications Carriers (except Satellite)[159]	608	522	85.86
Wireless Telephony[160]	336	262	77.98

D. Description of Economic Impact and Projected Reporting, Recordkeeping, and Other Compliance Requirements for Small Entities

8. The RFA directs agencies to describe the economic impact of proposed rules on small entities, as well as projected reporting, recordkeeping and other compliance requirements, including an estimate of the classes of small entities which will be subject to the requirements and the type of professional skills necessary for preparation of the report or record.[161]

9. The Commission believes that the changes proposed in the *Notice*, if adopted, would not impose new reporting, recordkeeping, or other compliance obligations, but would update existing recordkeeping requirements to remove references to out-of-date technology. There would be no associated costs of complying with the proposed rule changes.

[157] Affected Entities in this industry include all reporting fixed local service providers (CLECs & ILECs).

[158] Local Resellers fall into another U.S. Census Bureau industry (Telecommunications Resellers) and therefore data for these providers is not included in this industry.

[159] Affected Entities in this industry include all reporting wireless carriers and service providers.

[160] Affected Entities in this industry include Cellular/PCS/SMR - Specialized Mobile Radio Licensees and SMR (Dispatch).

[161] 5 U.S.C. § 603(b)(4).

E. Discussion of Significant Alternatives Considered That Minimize the Significant Economic Impact on Small Entities

10. The RFA directs agencies to provide a description of any significant alternatives to the proposed rules that would accomplish the stated objectives of applicable statutes, and minimize any significant economic impact on small entities.[162] The discussion is required to include alternatives such as: "(1) the establishment of differing compliance or reporting requirements or timetables that take into account the resources available to small entities; (2) the clarification, consolidation, or simplification of compliance and reporting requirements under the rule for such small entities; (3) the use of performance rather than design standards; and (4) an exemption from coverage of the rule, or any part thereof, for such small entities."[163]

11. The Commission's specific proposed changes, if adopted, are not anticipated to cause any economic impact on small entities. The proposed streamlining of the existing accessibility rules aims to reduce burdens on small entities. The Commission believes that the alternative of retaining the rules' existing language could potentially impose costs on small entities over time. More generally, the Commission seeks comment on improving accessibility without inhibiting innovation, and the Commission expects to consider alternatives that might minimize the economic impact of any final rules on small entities in reaching its final conclusions and taking action in this proceeding.

F. Federal Rules that May Duplicate, Overlap, or Conflict with the Proposed Rules

12. None.

[162] *Id.* § 603(c).

[163] *Id.* § 603(c)(1)-(4).

STATEMENT OF
CHAIRMAN BRENDAN CARR

Re: *Implementation of Sections 716 and 717 of the Communications Act of 1934, as Enacted by the Twenty-First Century Communications and Video Accessibility Act of 2010*; *Telecommunication Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities*; *Consumer and Governmental Affairs, Media, and Wireless Telecommunications Bureaus Seek Update on Commission's Fulfillment of the Twenty-First Century Communications and Video Accessibility Act*, CG Docket Nos. 10-231, 03-123, GN Docket No. 21-140, Notice of Proposed Rulemaking (October 29, 2026).

Earlier this month, the Commission had the chance to celebrate the 16th anniversary of the CVAA here at the FCC. We had a series of panel discussions that focused on the important wins that have been achieved and on the challenges that we are now taking on. We also delivered our CVAA Biennial Report to Congress, which outlined the path ahead. And I had the privilege to hand out the Chairman's Awards for Advancement in Accessibility to some great advocates and innovators.

Today's vote builds on this effort by ensuring our rules are responsive to those advancements in the communications marketplace. As we continue to support the transition to modern, faster networks, including ones that support advanced video platforms, D2D connectivity, and Next Generation 911 services, we need to make sure that our accessibility rules keep pace. This item does exactly that.

Thanks to staff for their efforts on this item including Stephen Wang, Molly Burgdorf, Ike Ofobike, Michael Scott, Suzy Rosen Singleton, Olivia Fergerstrom, Lisa Wilson Edwards, and Ed Bartholme.

STATEMENT OF
COMMISSIONER OLIVIA TRUSTY

Re: *Implementation of Sections 716 and 717 of the Communications Act of 1934, as Enacted by the Twenty-First Century Communications and Video Accessibility Act of 2010*; *Telecommunication Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities*; *Consumer and Governmental Affairs, Media, and Wireless Telecommunications Bureaus Seek Update on Commission's Fulfillment of the Twenty-First Century Communications and Video Accessibility Act*, CG Docket No. 10-213, 03-123, GN Docket No. 21-140, Notice of Proposed Rulemaking (October 29, 2026).

Earlier this month, the Commission celebrated the Twenty-First Century Communications and Video Accessibility Act and recognized the winners of the Chairman's Awards for Advancement in Accessibility. I left that event impressed, inspired – and unexpectedly hungry.

Participants on both panels compared accessible technology to chocolate chip cookies. If you leave out the chocolate chips, it is hard to add them once the cookies are baked.

The same goes for accessibility: it works best when built into a product from the start.

Getting that right takes collaboration. Developers, people with disabilities, and accessibility advocates each bring experience and expertise that can help make technology easier to use. Working together early in the design process helps identify barriers before they become built-in limitations.

The panels also emphasized that people have different needs and preferences. A single accessibility solution might not be ideal for every user or use case. And to borrow from the cookie analogy one more time, some people prefer soft cookies, others crispy; some want nuts, and others need a gluten-free option. The same cookie is not right for everyone.

Likewise, accessibility solutions need to account for different users and the ways they use technology.

Today's item builds on those conversations and invites further input from industry, accessibility advocates, and the people who rely on these technologies every day. Their experiences will help us understand where barriers remain and what the Commission can do to help remove them.

Our work to expand connectivity and advance American technology leadership should create opportunities for all Americans.

I look forward to hearing how we can encourage continued innovation that helps people with disabilities communicate, work, and participate more fully in their communities.

I thank the Consumer and Governmental Affairs Bureau for its thoughtful work on this item.