

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



October 14, 2011

NOTICE TO ALL CARRIERS OFFERING LIFELINE IN CALIFORNIA

RE: Captioned Telephone technology in the California LifeLine Program

In response to questions raised by members of the California LifeLine community, the Commission examined whether Captioned Telephone (CapTel) technology should be treated as a functional equivalent of Text Telephone (TTY) and 2-line Voice Carryover (VCO)¹ services used with the California Relay Service. Based on our review, we authorize two California LifeLine line discounts for 2-line CapTel users that qualify for California LifeLine service.

TTY is used by deaf and hard of hearing persons to place telephone calls through the California Relay Service. The TTY user/caller uses text and graphic messages, and the California Relay Service representative speaks to the called party. The Relay representative then types a response back to the caller. Commission Decision (D.) 00-10-028 authorized two LifeLine line discounts for TTY users that qualify for California LifeLine service.

Based on our research, a CapTel device is used by deaf and hard of hearing persons to place telephone calls through a relay service similar to the way a 2-line VCO device is used by deaf and hard of hearing persons to place telephone calls. Both services use two telephone lines (one voice and one data) to connect to a type of relay service which enables the deaf or hard of hearing person to speak with his/her own voice and simultaneously read (via text or caption) what is being said by the other party on the call on a specialized device (either a CapTel telephone or VCO telephone).

With both services, the other party (non-CapTel or non-VCO user) speaks directly to the deaf or hard of hearing person they are communicating with and the 2-line CapTel or 2-line VCO user listens to and reads the message on the screen of their device, as it is either voiced or typed by the communication assistant at the relay service. The CapTel or VCO user responds by speaking directly to the other party. The CapTel service is generally faster than using 2-line VCO service, because the communication assistant re-voices what the CapTel user says and the speech-to-text recognition technology automatically transcribes the CapTel user's voice in the text (captions) which is simultaneously displayed on the captioned telephone.

The CapTel device can operate with only one line, but the person calling the CapTel user must first call an 800 number to connect to the captioning center and then dial the telephone number of the CapTel user. With two lines connected to the CapTel device, the person calling the CapTel user can directly dial the telephone number of the CapTel user. For 911 calls, the CapTel user just dials 911 and the 911 operator will know to type a response; similarly with a VCO through the California Relay Service, the 911 attendant knows to type the response.

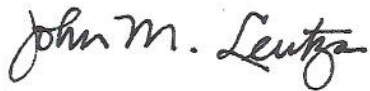
Based on D. 00-10-028, 2-line CapTel service is a functional equivalent of 2-line TTY and 2-line VCO services, and can be authorized for two California LifeLine discounted lines. California LifeLine Service Providers are authorized to treat 2-line CapTel users that qualify for California LifeLine as eligible for

¹ VCO is a relay option for people who are deaf or hard of hearing but who wish to speak directly through the telephone receiver to be heard by the other party.

two California LifeLine lines. Please note, however, that the federal Lifeline/Linkup program does not recognize the second line for CapTel service at this time.

More information on CapTel service can be found at: <http://www.captel.com/>, and more information on 2-line VCO telephones and the California Relay Service can be found at www.ddtp.org. Ordering Paragraph (OP) 107 of D. 00-10-028 authorizes the Communications Division (CD) to make administrative changes to the program without issuing a resolution.

For questions regarding the new California LifeLine procedures, please contact Benjamin Schein at 415-703-1088, bda@cpuc.ca.gov, or Cherrie Conner at 415-703-2767, chr@cpuc.ca.gov.

A handwritten signature in black ink that reads "John M. Leutza". The signature is written in a cursive style with a large initial "J" and "L".

John M. Leutza, Director
Communications Division